LEWIS BRISBOIS BISGAARD & SMITH LLP 1 DANA ALDEN FOX, SB# 119761 E-Mail: Dana.Fox@lewisbrisbois.com 2 EDWARD EARL WARD JR. SB#249006 E-Mail: Edward.Ward@lewisbrisbois.com 3 TERA A. LUTZ, SB# 305304
E-Mail: Tera.Lutz@lewisbrisbois.com
633 West 5<sup>th</sup> Street, Suite 4000
Los Angeles, California 90071
Telephone: 213.250.1800 4 Facsimile: 213.250.7900 Attorneys for Defendant, SANG LEE 8 UNITED STATES DISTRICT COURT 9 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION 10 11 CASE NO. 2:16-cv-02129-SJO (RAOx) CORY SPENCER, an individual; 12 DIANA MILENA REED, an individual; and COASTAL 13 Assigned District Judge Hon. S. James PROTECTION RANGERS, INC., a Otero, Courtroom 10C California non-profit public benefit 14 corporation, Discovery Assigned to Magistrate Judge 15 Hon. Rozella A. Oliver Plaintiffs, 16 DEFENDANT SANG LEE'S VS. NOTICE OF ERRATA AND 17 ERRATA TO DECLARATION OF LUNADA BAY BOYS; THE TERA LUTZ IN SUPPORT OF DEFENDANT'S OPPOSITION TO INDIVIDUAL MEMBERS OF THE 18 LUNADA BAY BOYS, including but PLAINTIFFS' MOTION FOR not limited to SANG LEE, BRANT 19 BLAKEMAN, ALAN JOHNSTON AKA JALIAN JOHNSTON, SANCTIONS 20 Judge: Hon. Hon. Rozella Oliver MICHAEL RAE PAPAYANS Date: October 12, 2017 ANGELO FERRARA, FRANK 21 FERRARA, CHARLIE FERRARA; and N.F.; CITY OF PALOS VERDES ESTATES; CHIEF OF Time: 10:00 a.m. Crtrm.: F 22 POLICE JEFF KEPLEY, in his 23 March 29, 2016 representative capacity; and DOES Complaint filed: Trial Date: Dec., 12, 2017 1-10, 24 Defendants. 25 26 PLEASE TAKE NOTICE THAT Defendant Sang Lee ("Defendant") files 27 this Notice of Errata and Errata to correct the following error contained in the 28 2:16-cv-2129 4826-0327-1505.1 DEFENDANT SANG LEE'S NOTICE OF ERRATA AND ERRATA TO DECLARATION OF TERA LUTZ IN SUPPORT OF DEFENDANT'S OPPOSITION TO PLAINTIFFS' MOTION FOR SANCTIONS

BRISBOIS

BISGAARD & SMITH LLP

Declaration of Tera Lutz In Support of Defendant Sang Lee's Opposition To 1 Plaintiff's Motion For Sanctions Against Defendant Sang Lee ("Lutz Declaration"), 2 filed on October 5, 2017 at Docket No. 472. 3 1. Defendant inadvertently covered parts of Exhibits "A" and "C," referenced in the Lutz Declaration. 5 Defendant submits a revised version of the Lutz Declaration, which includes 6 clean copies of the aforementioned exhibits. The Lutz Declaration remains unchanged. 8 9 DATED: October 6, 2017 LEWIS BRISBOIS BISGAARD & SMITH LLP 10 11 12 /s/ Tera A. Lutz By: 13 Dana Alden Fox Edward E. Ward, Jr. 14 Tera A. Lutz 15 Attorneys for Defendant, SANG LEE 16 17 18 19 20 21 22 23 24 25 26 27 28 2:16-cv-2129 4826-0327-1505.1 DEFENDANT SANG LEE'S NOTICE OF ERRATA AND ERRATA TO DECLARATION OF TERA LUTZ IN

SUPPORT OF DEFENDANT'S OPPOSITION TO PLAINTIFFS' MOTION FOR SANCTIONS

## DECLARATION OF TERA A. LUTZ

I, Tera A. Lutz, declare as follows:

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- I am an attorney duly admitted to practice in all of the courts of the State of California and I am an associate with Lewis Brisbois Bisgaard & Smith LLP, attorneys of record for Defendant SANG LEE herein. The facts set forth herein are of my own personal knowledge, and if sworn I could and would competently testify thereto.
- 2. On August 18, 2017, Lee's phone was retained by a forensic analyst for imaging in order to preserve evidence on his cell phone. This was completed despite the fact plaintiffs never served Lee or his counsel with a preservation demand letter.
- 3. On December 12, 2016, Defendant Lee produced a redacted copy of an extraction report generated as a result of imaging Defendant Lee's cell phone.

  Attached hereto as Exhibit "A" is a true and correct copy of select excerpts of the extraction report produced in Defendant Sang Lee's Responses to Plaintiff's Request for Production of Documents, Set One.
- 4. The extraction report includes an extensive amount of information obtained from Sang Lee's cell phone, including but not limited to, text messages, images, installed applications, location history, user dictionary, and web bookmarks. Attached hereto as Exhibit "B" is a true and correct copy of select excerpts of the extraction report, produced in its entirety, as ordered by Judge Oliver on July 19, 2017.
- 5. While the date, time, and receipt information for text messages on Sang Lee's phone could be obtained, the body of a majority of Lee's text messages could not be recovered. In fact, a majority of the unrecoverable text messages were between Lee and individuals unrelated to this suit.
- 6. Attached hereto as Exhibit "C" is a true and correct copy of select excerpts from Sang Lee's deposition taken on May 31, 2017.

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4824-1445-2817.1

2:16-cv-2129

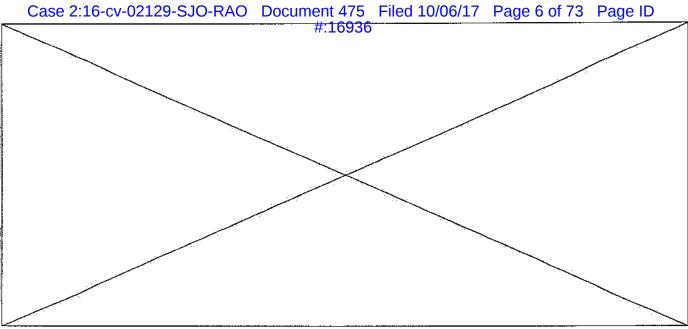
- 7. On September 5, 2017, Magistrate Judge Rozella A. Oliver ordered Lee to seek out further methods of recovery to determine whether the body text messages between Lee and his co-Defendants could be obtained.
- 8. Even though plaintiffs had knowledge of the existence of 17 text messages between Lee and his co-defendants, they never asked Lee a single question about their content during his nearly eight hour deposition.
- 9. Not a single defendant or witness in this case has testified they received or sent text messages to Sang Lee regarding the alleged incidents.
- 10. However, not a single co-Defendant was questioned in their deposition about the text messages from Sang Lee's Extraction Report. And plaintiffs never served discovery to any of the other co-Defendants regarding the text messages identified in Sang Lee's Extraction Report.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on October 5, 2017, at Los Angeles, California.

Tera A. Lutz

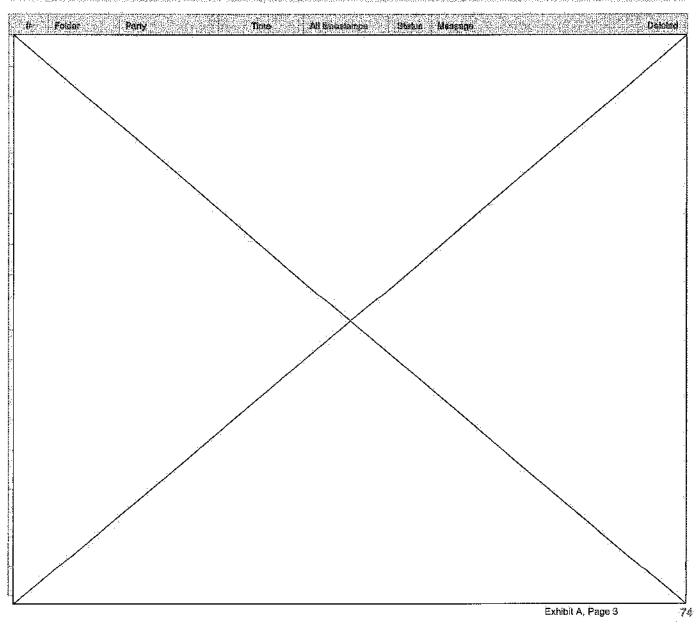
LEWIS BRISBOIS BISGAARD & SMITH LLP 

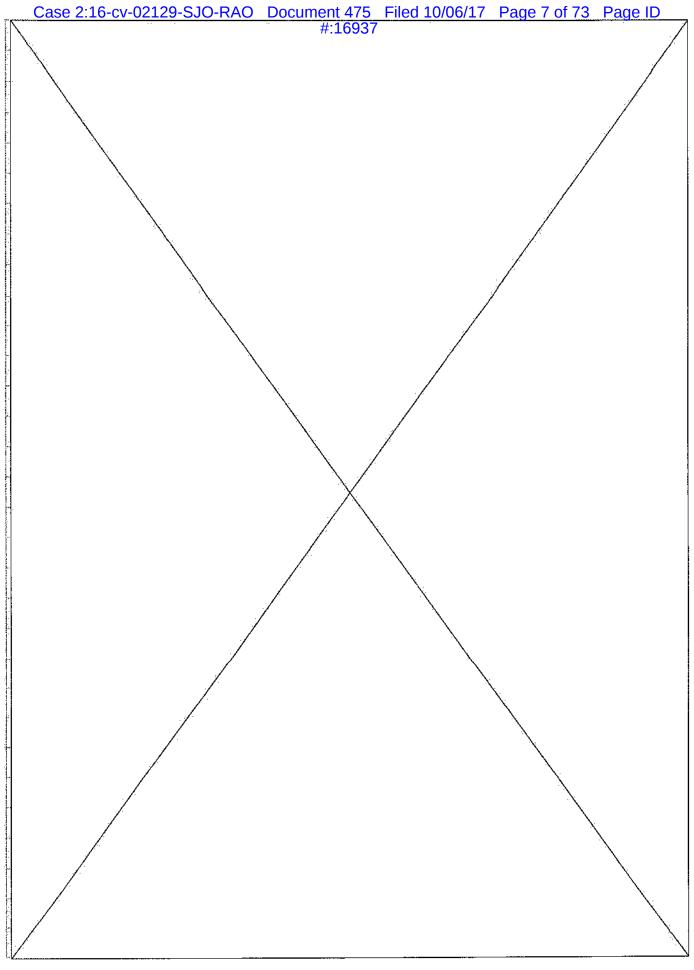
## **EXHIBIT A**

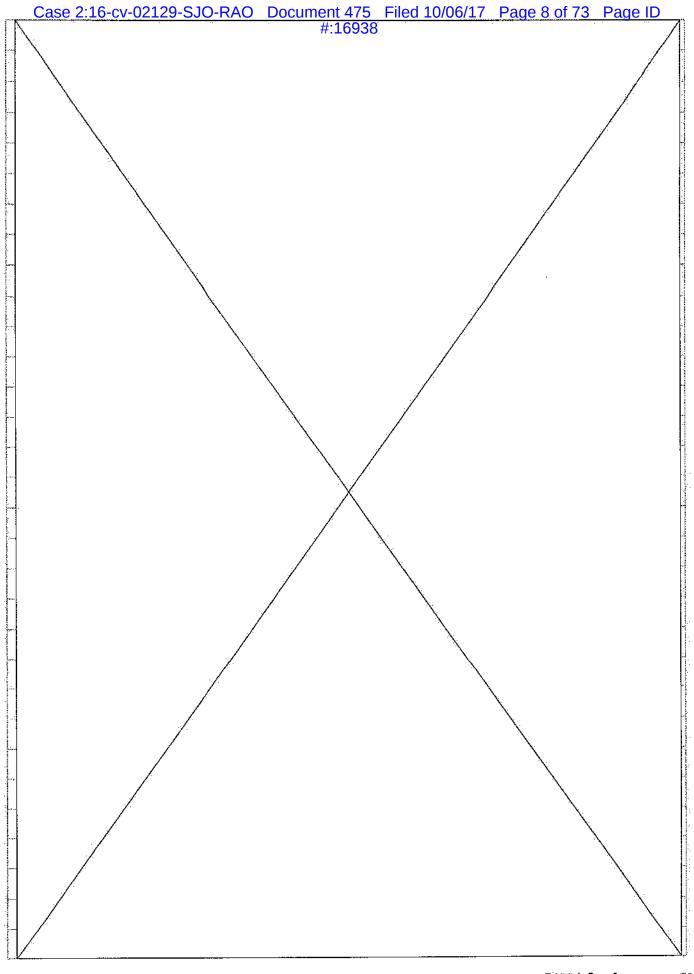


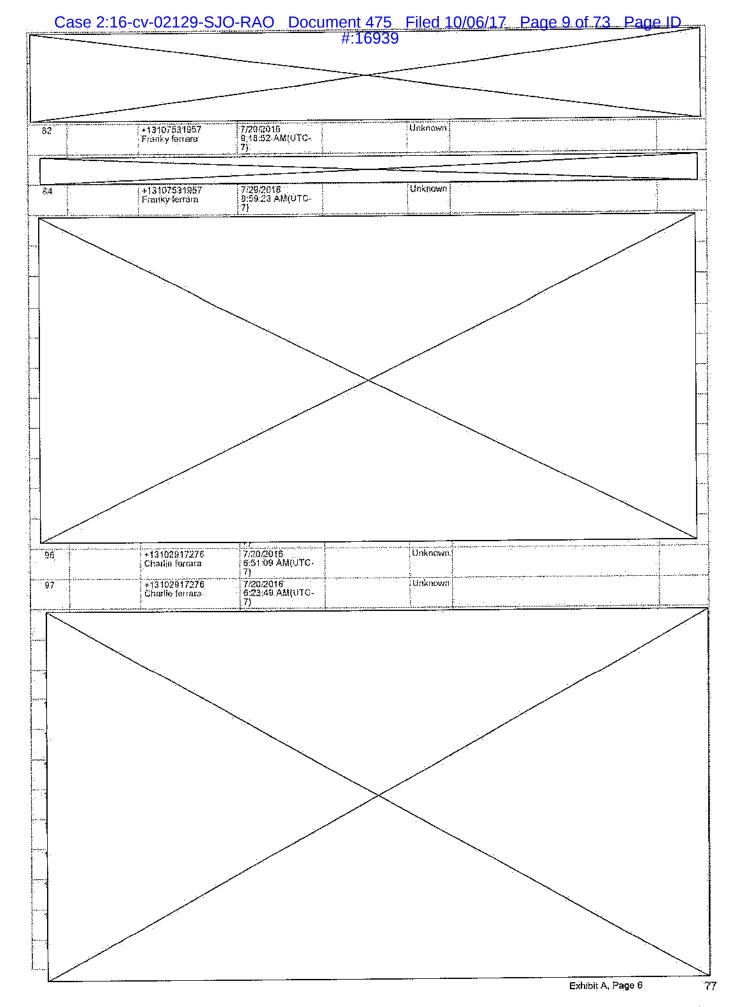
SMS Messages (924)

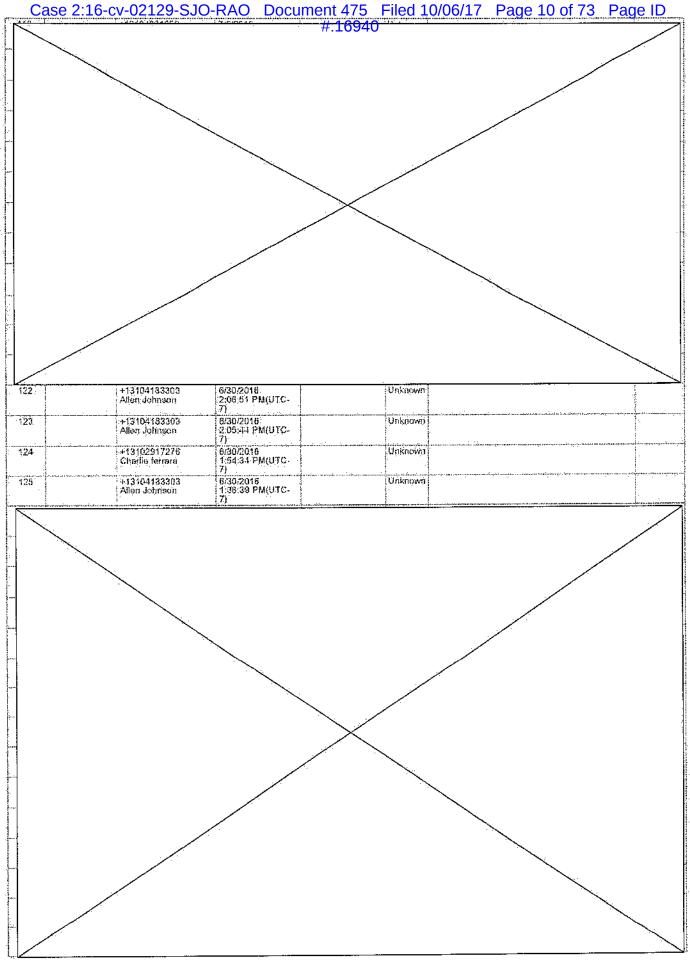
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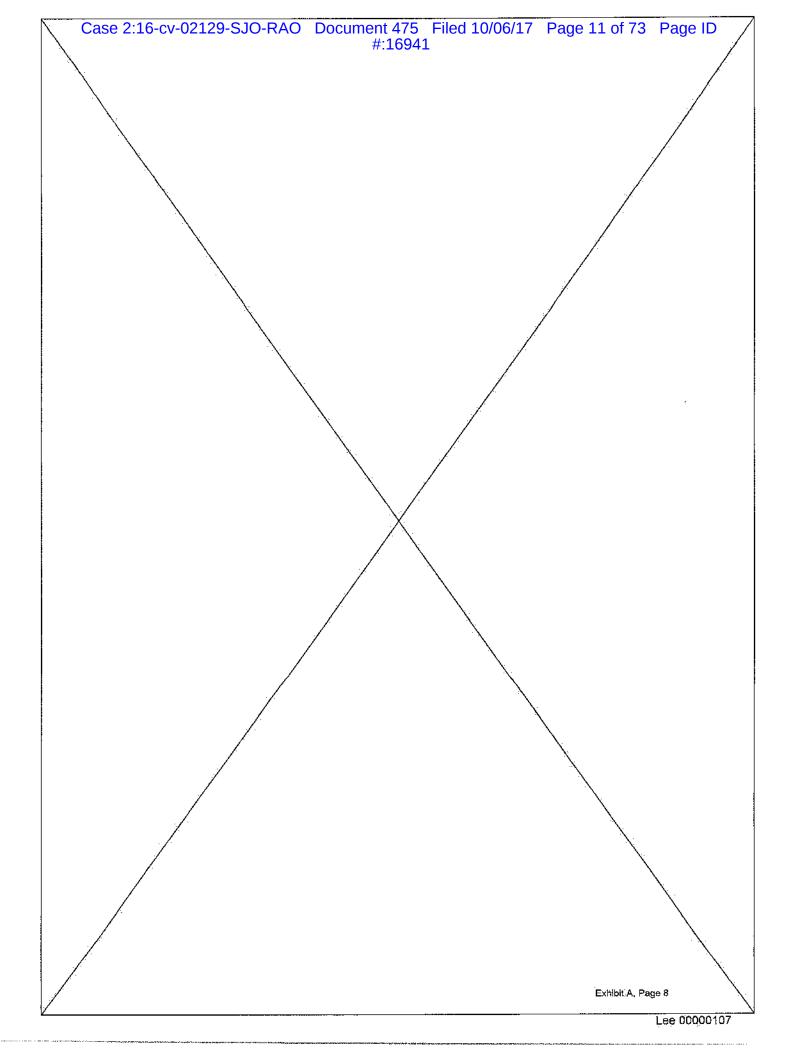


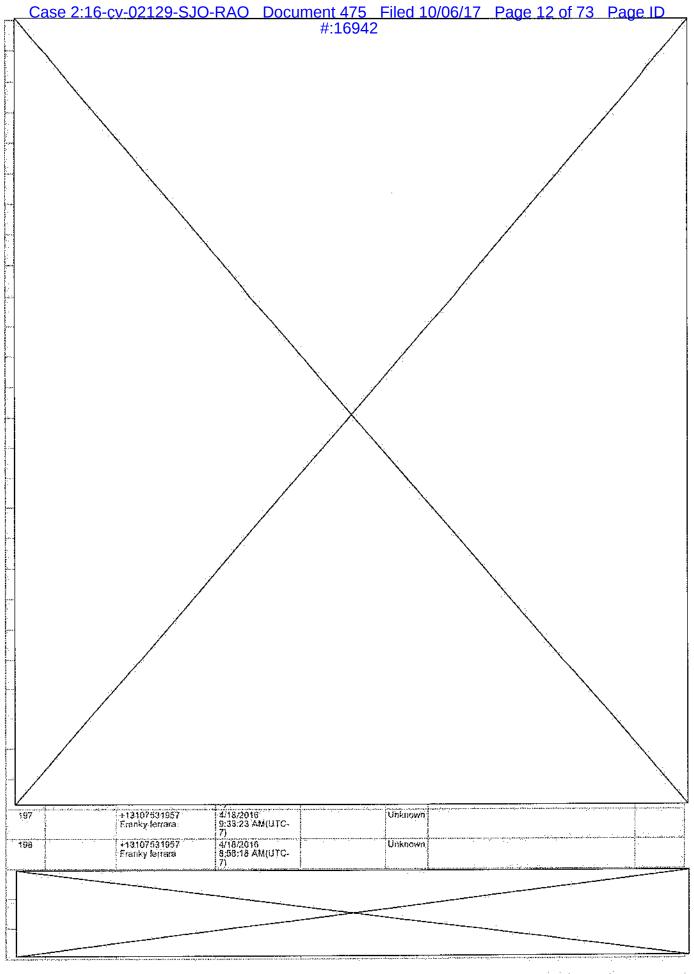


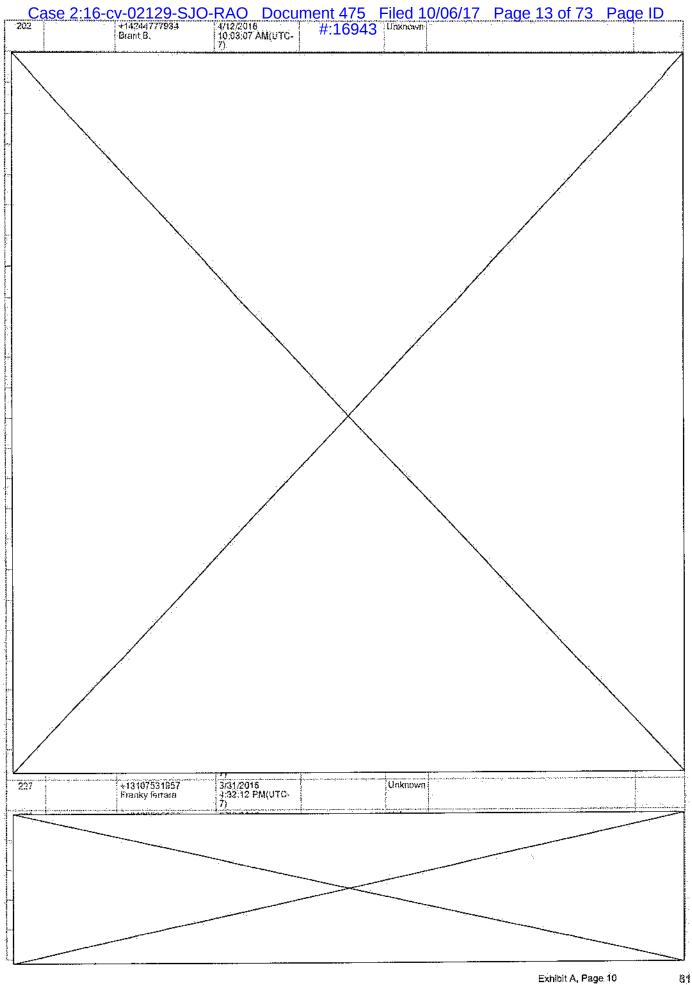


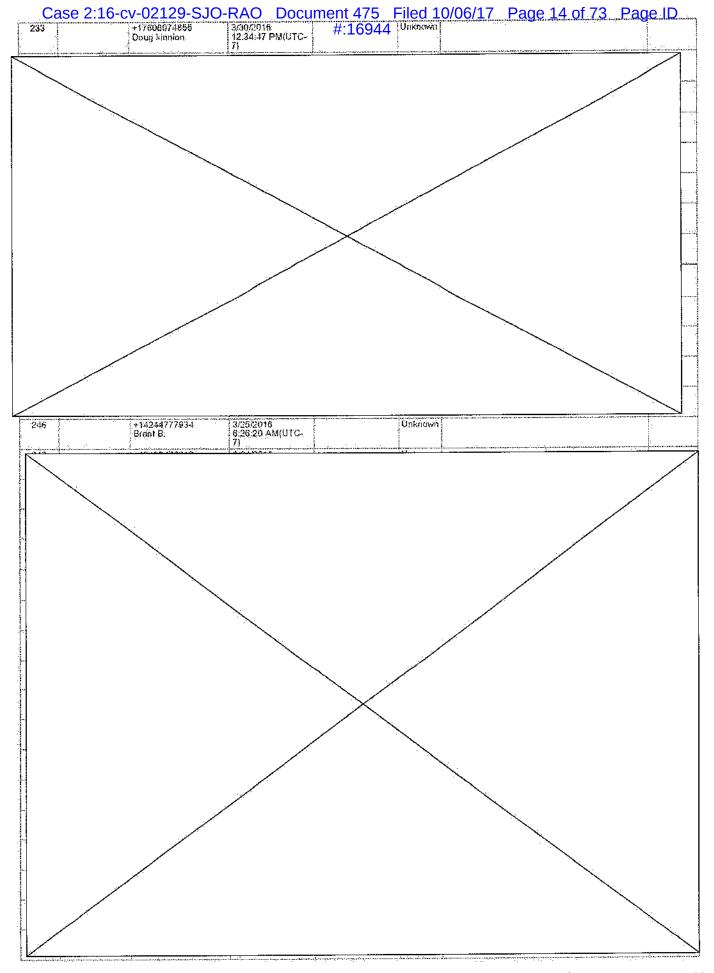


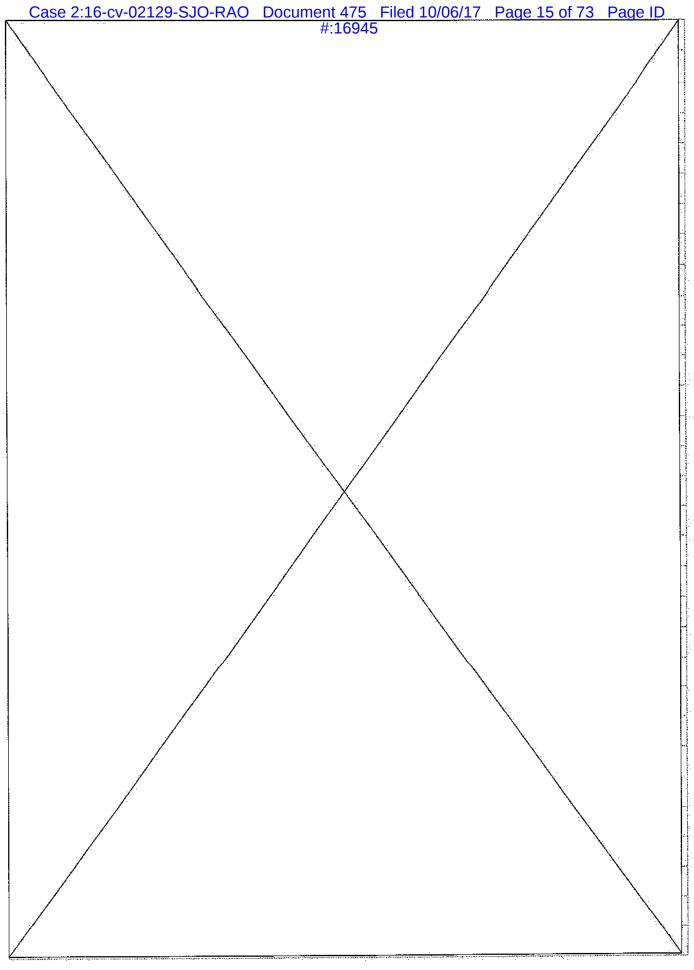


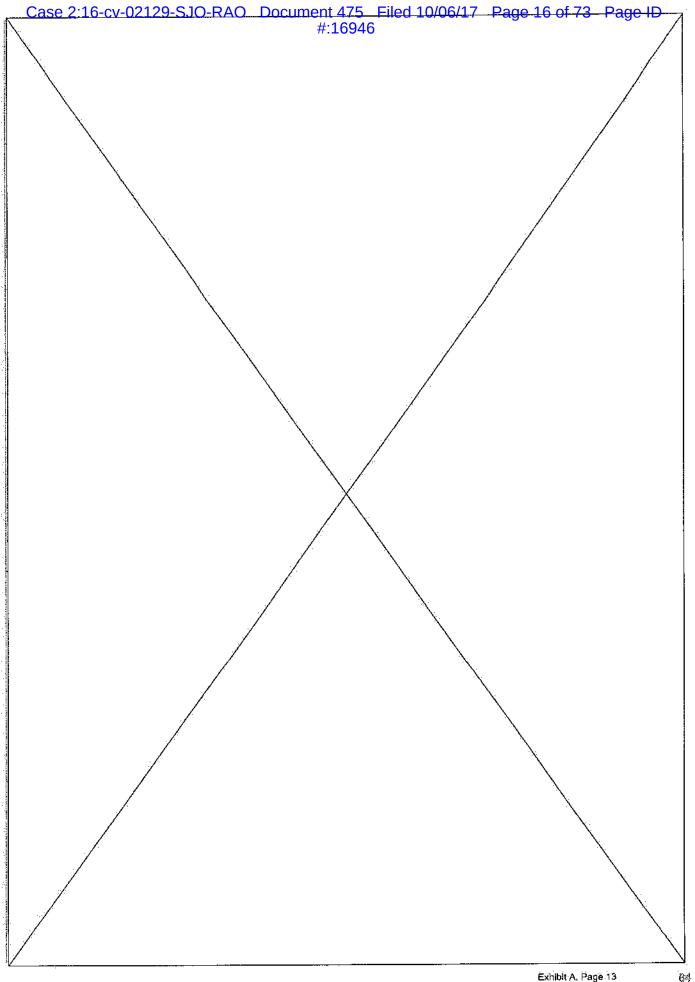


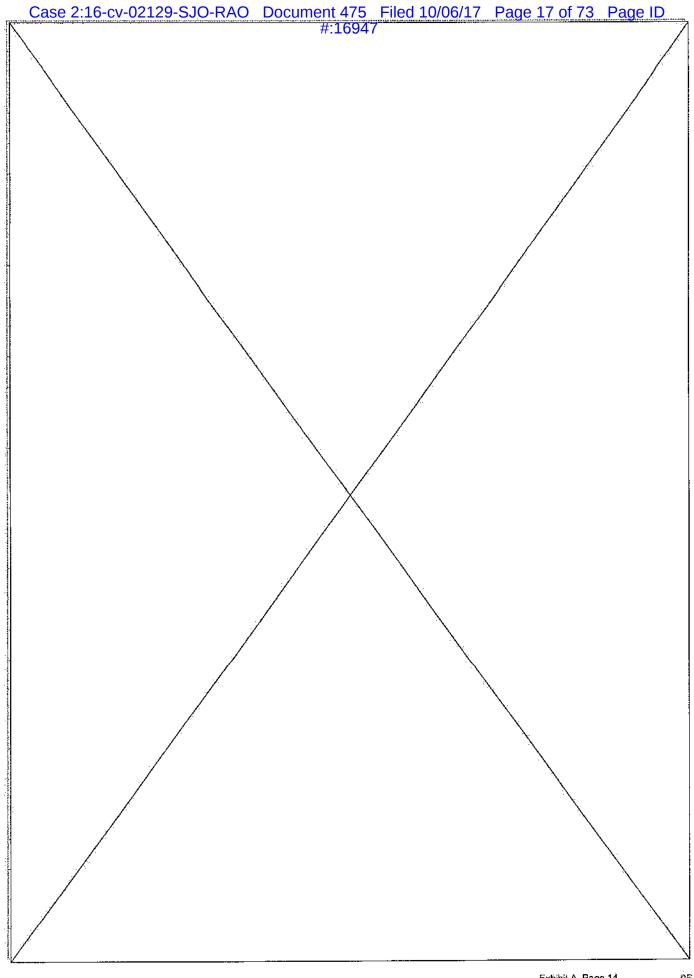




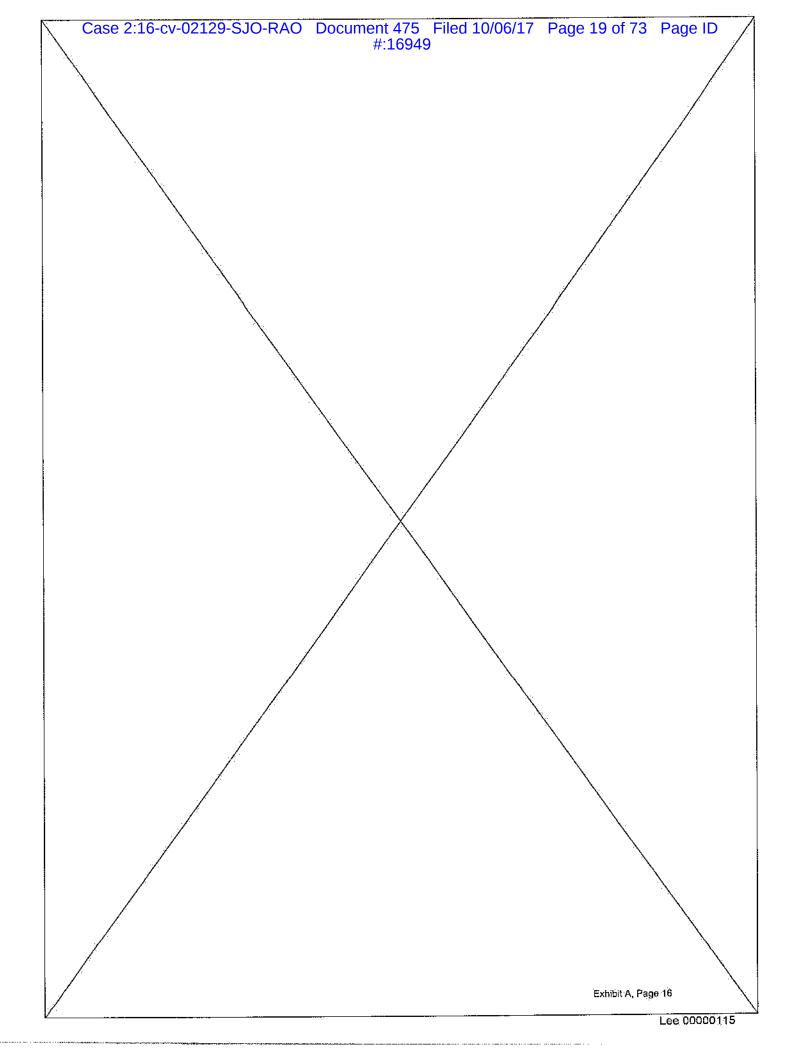


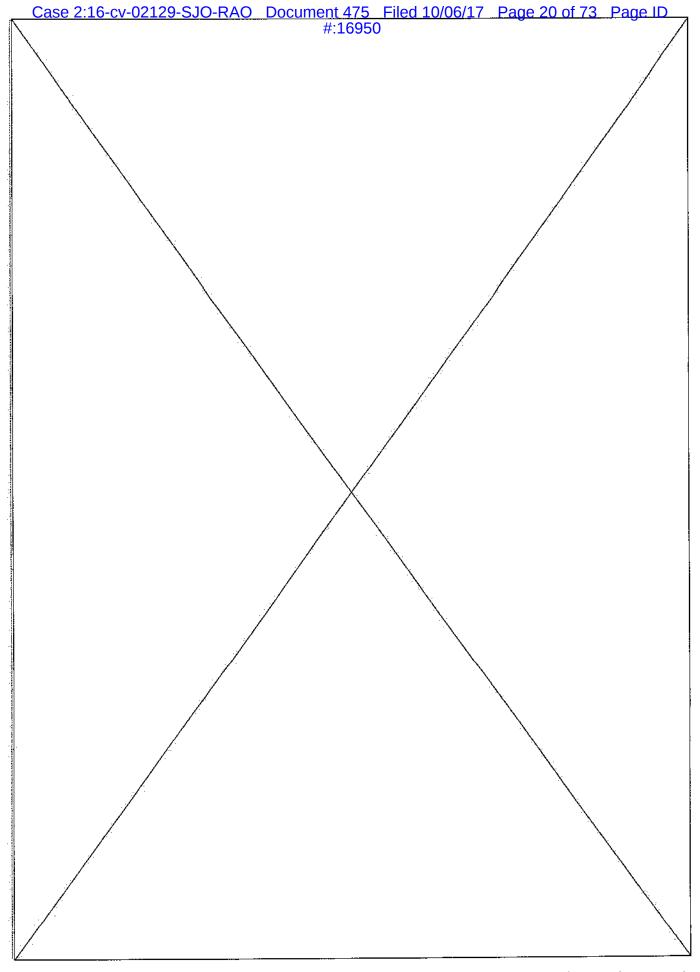


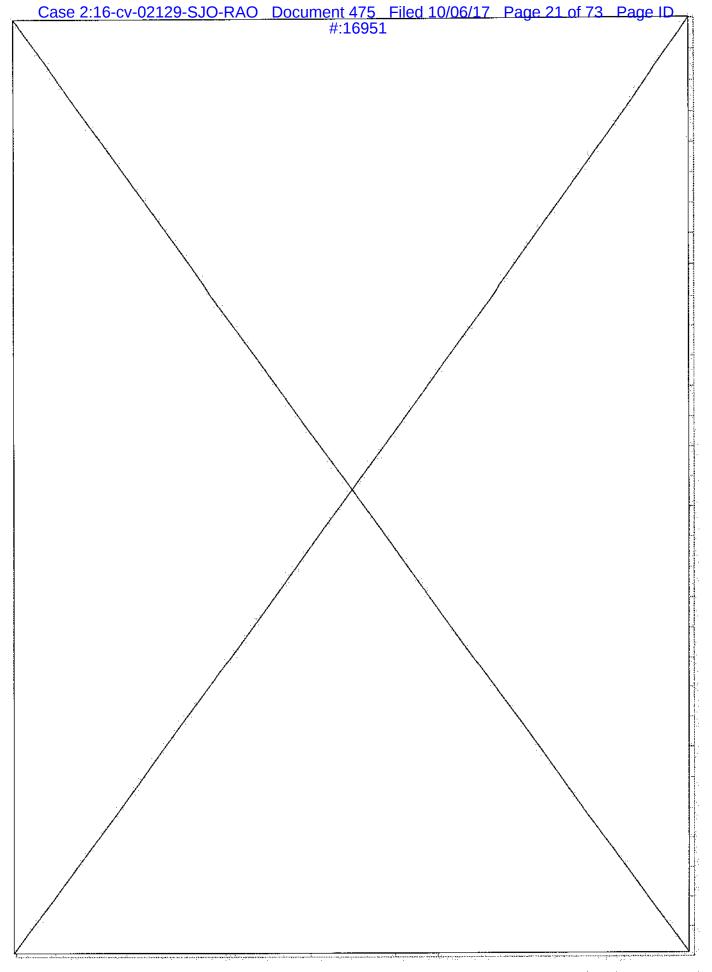


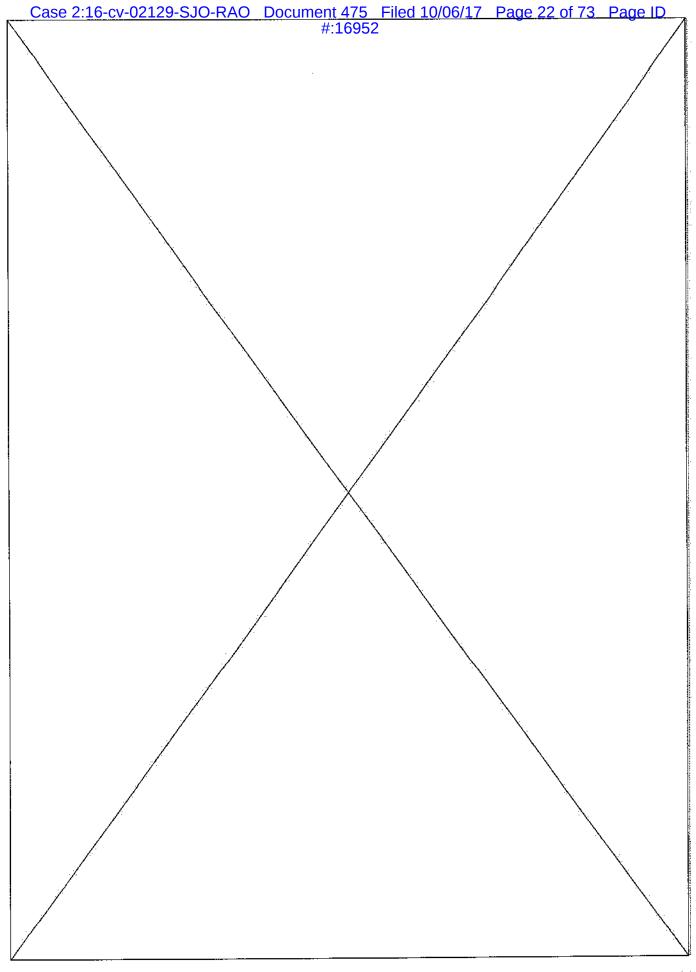


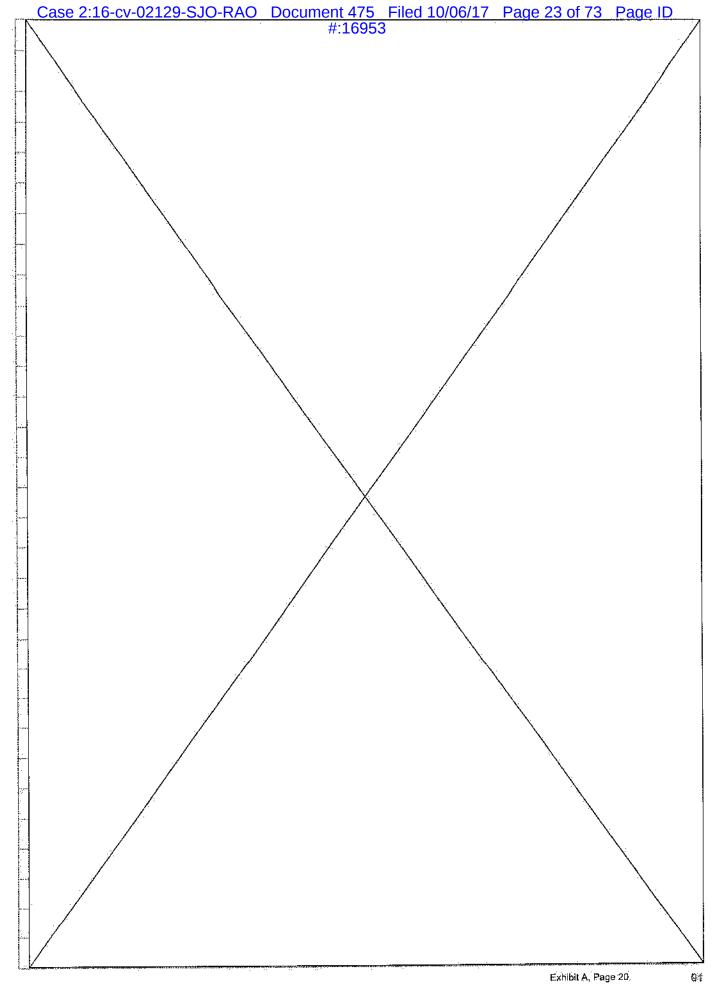
2/19/2016 5:32:26 PM(UTC-8) +13102921179 Pete babros 364 Unknown

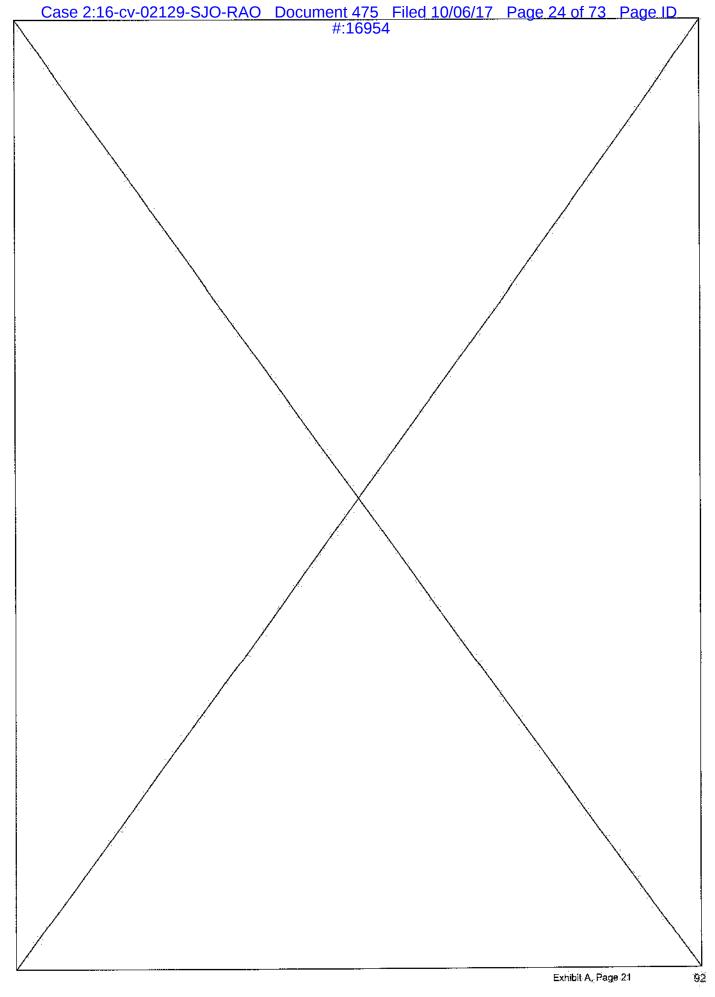


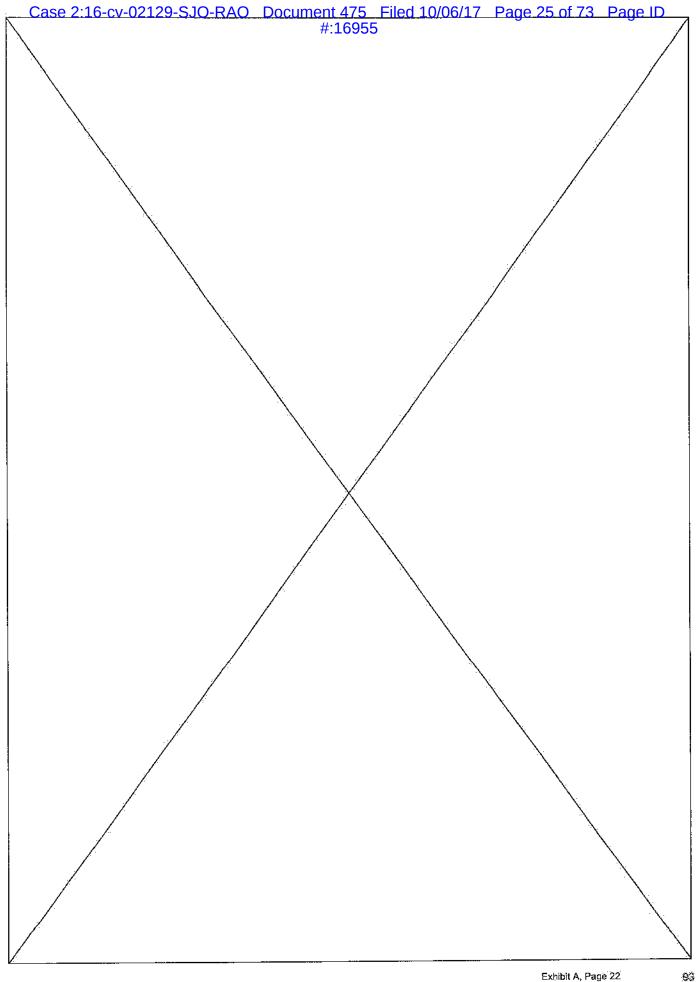


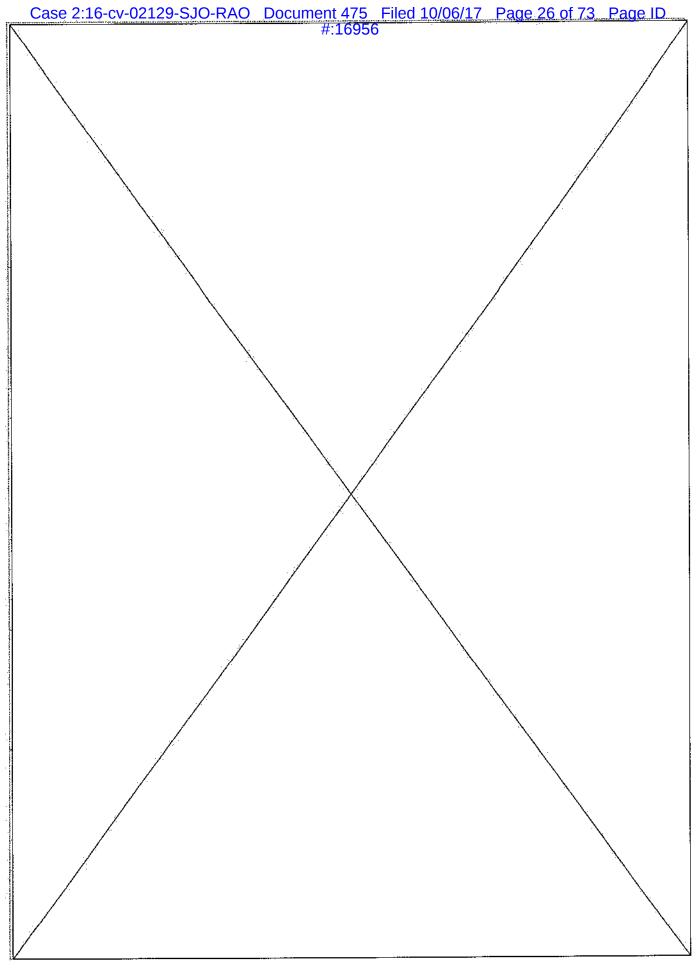


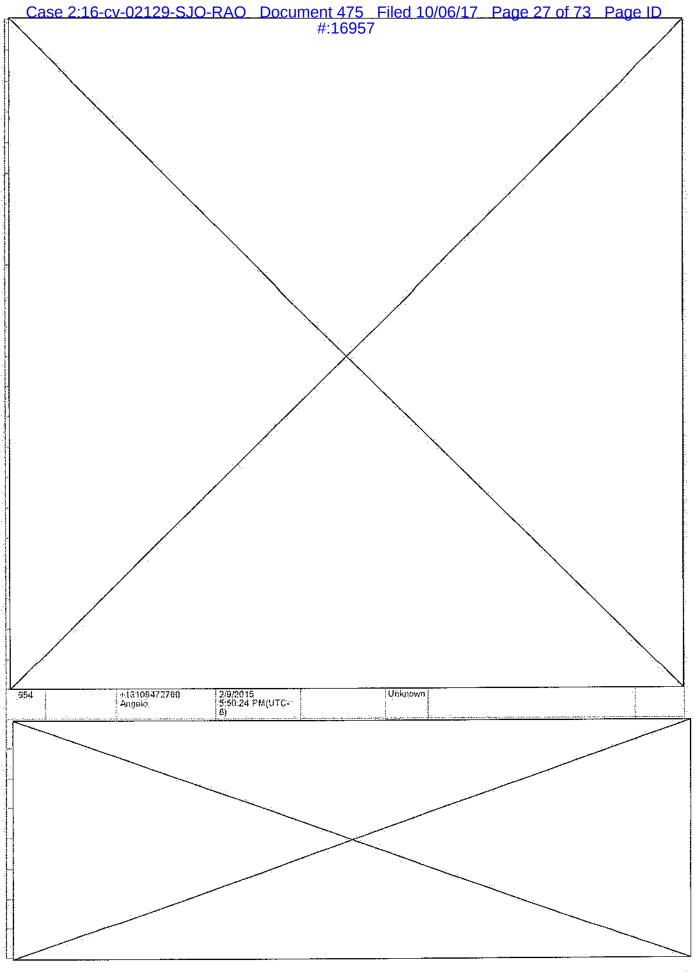


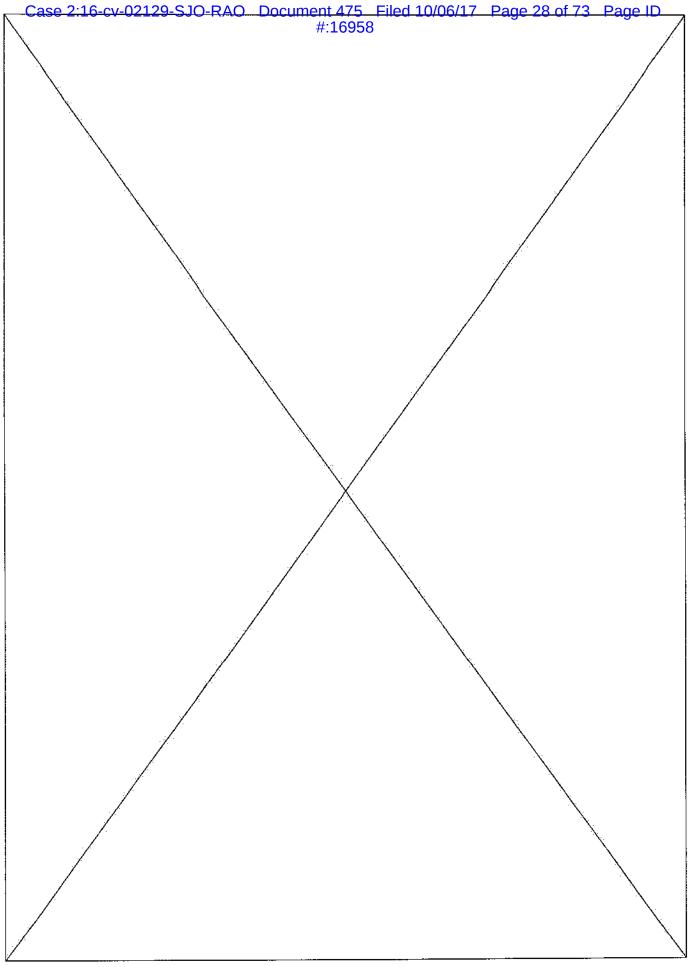


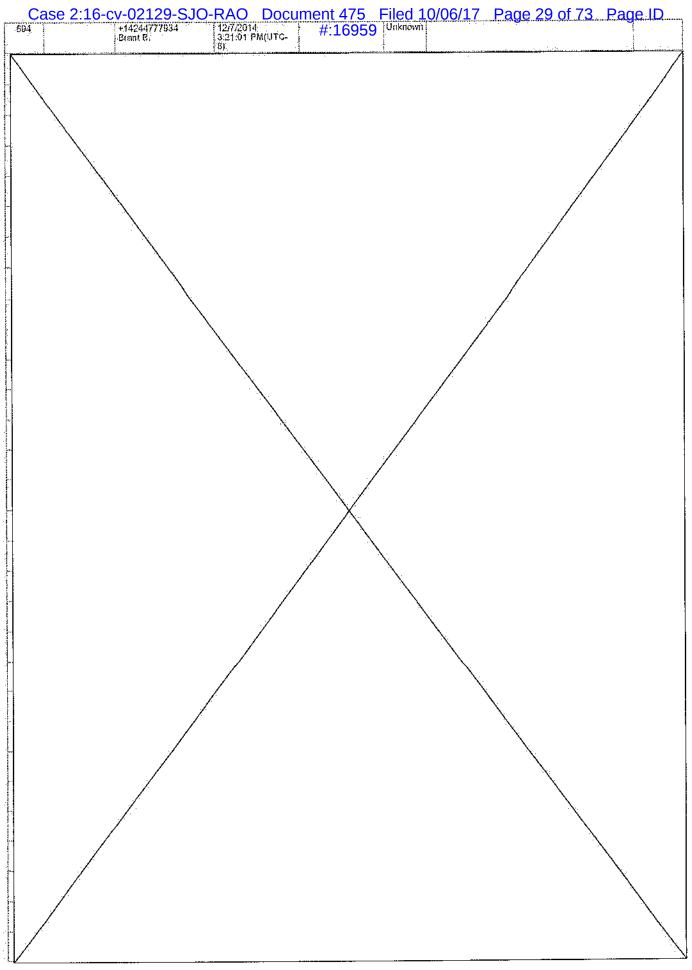


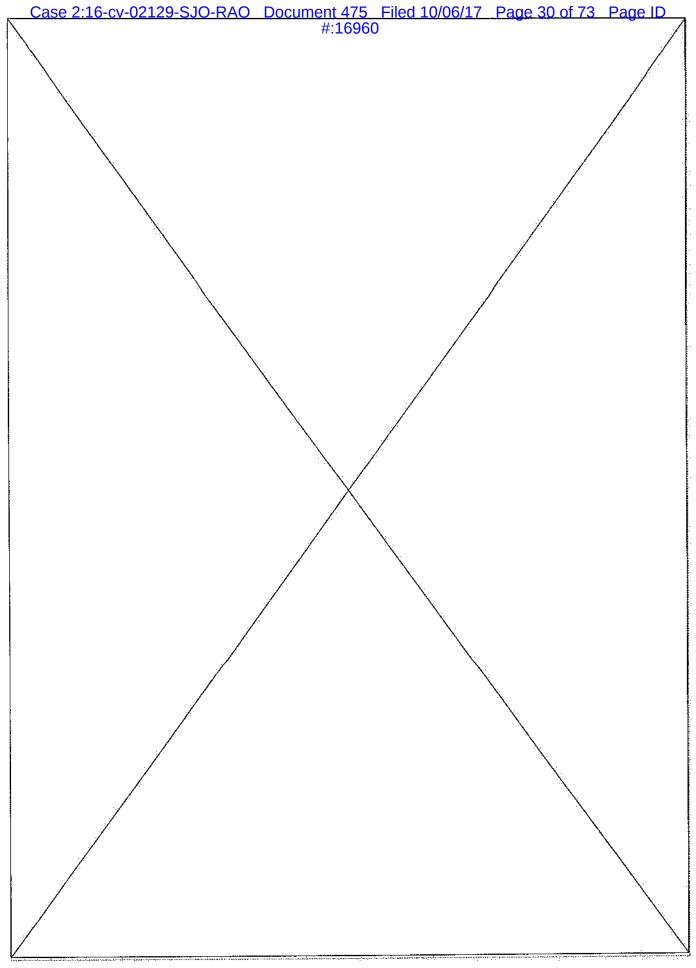


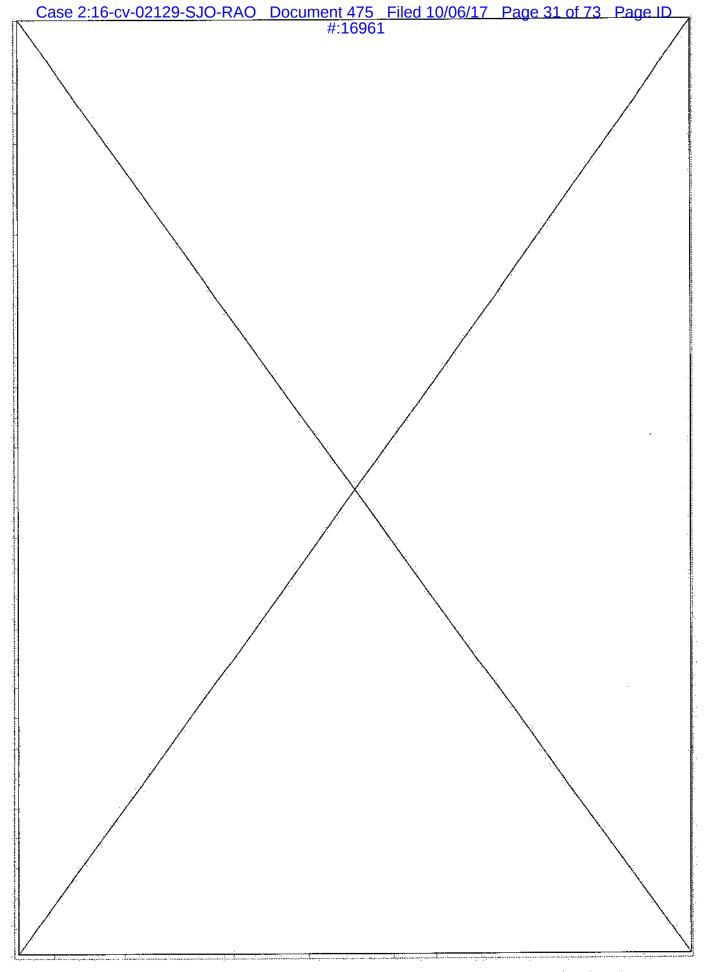


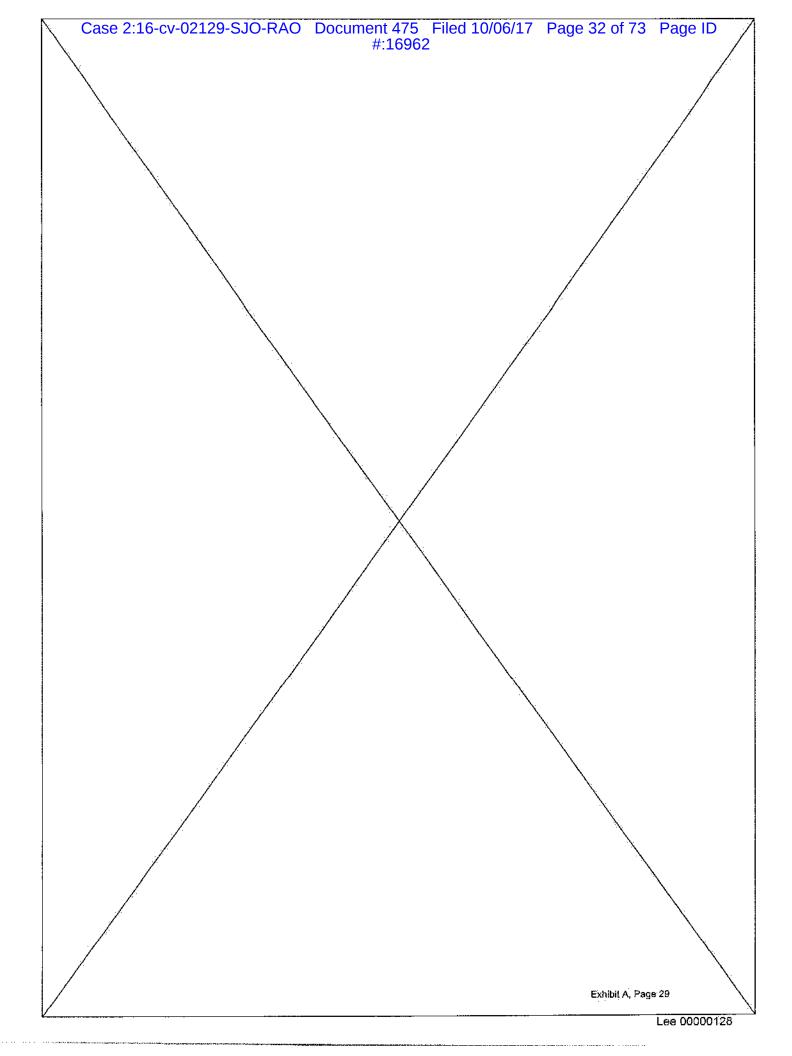


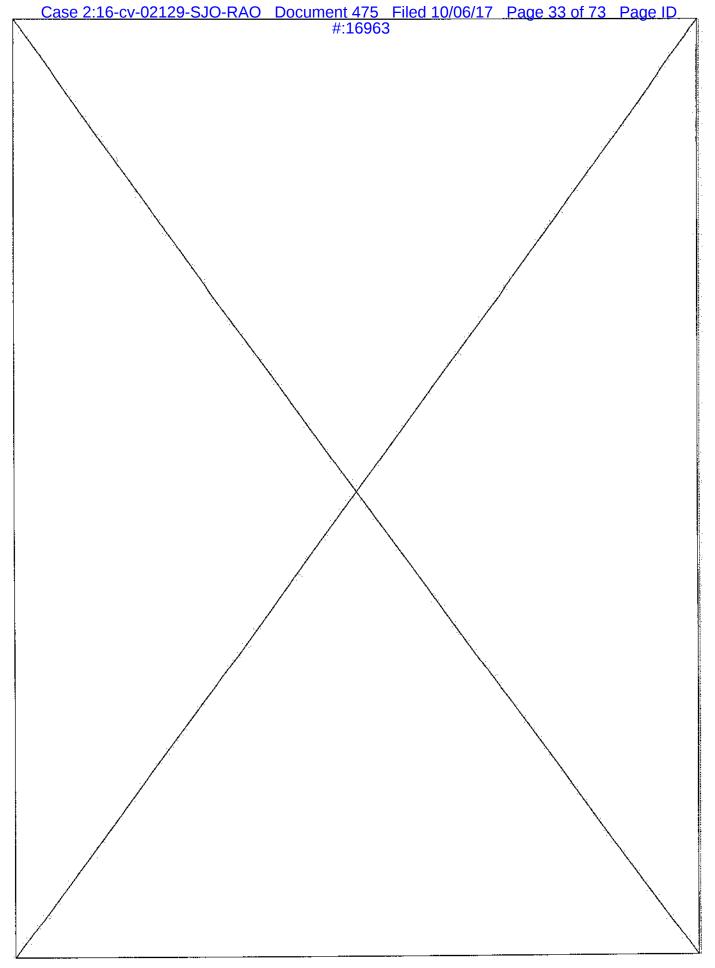


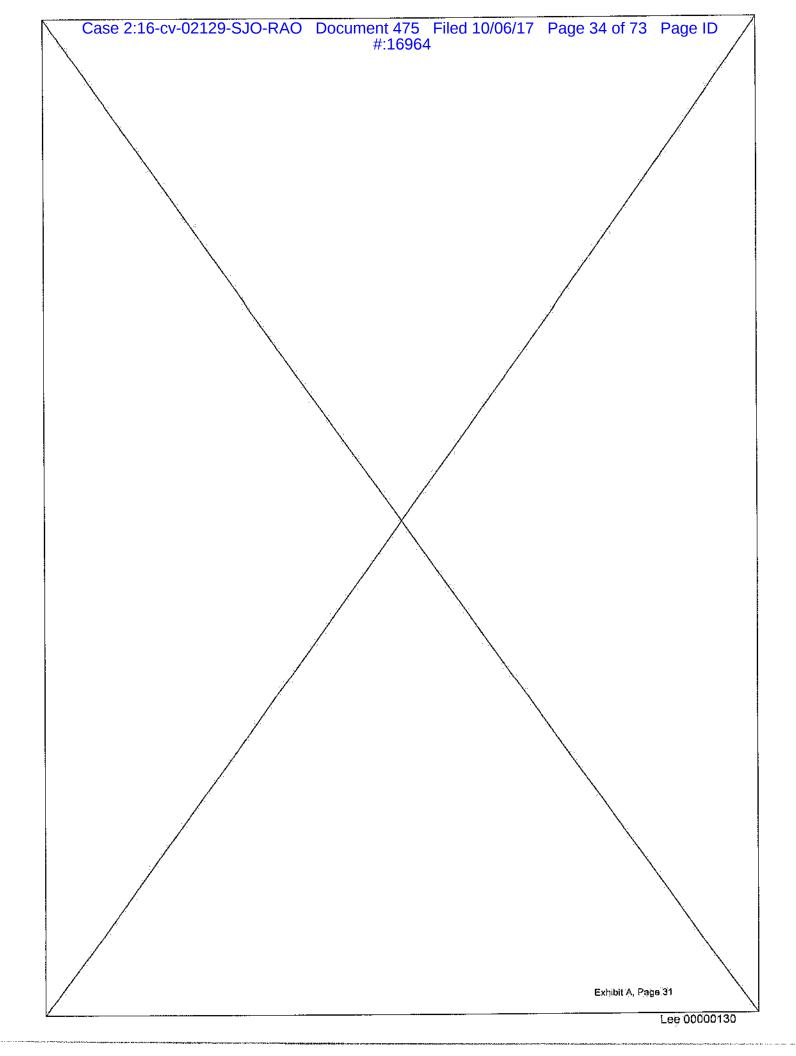


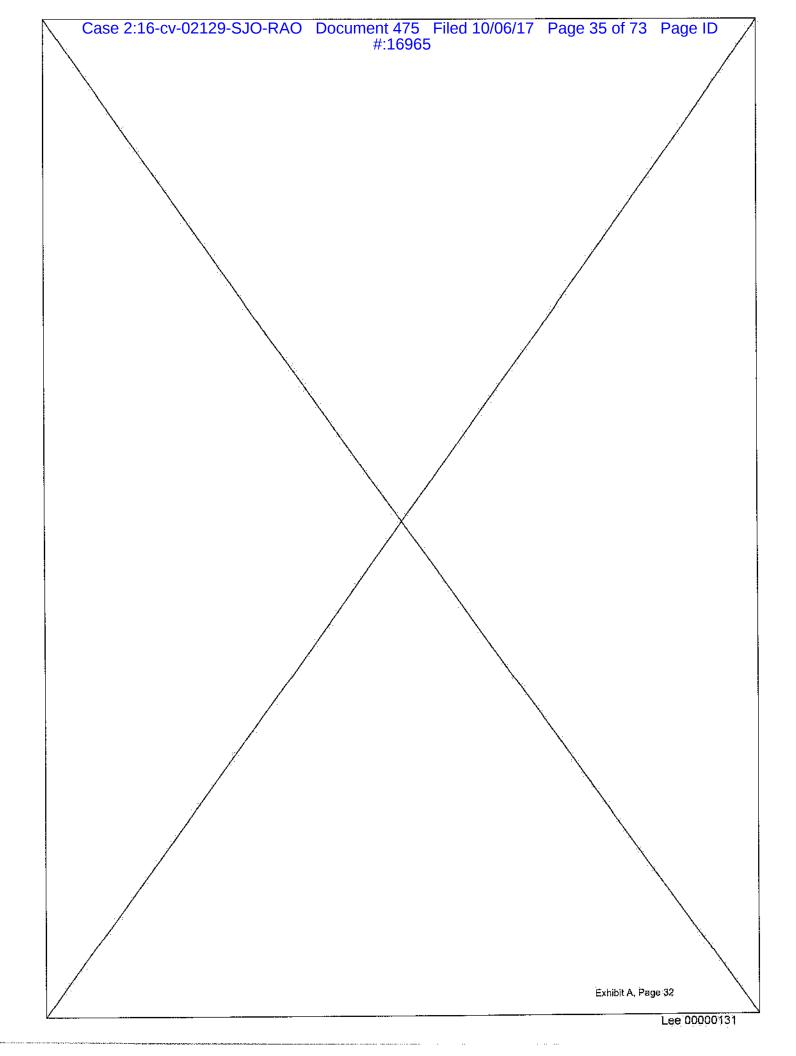


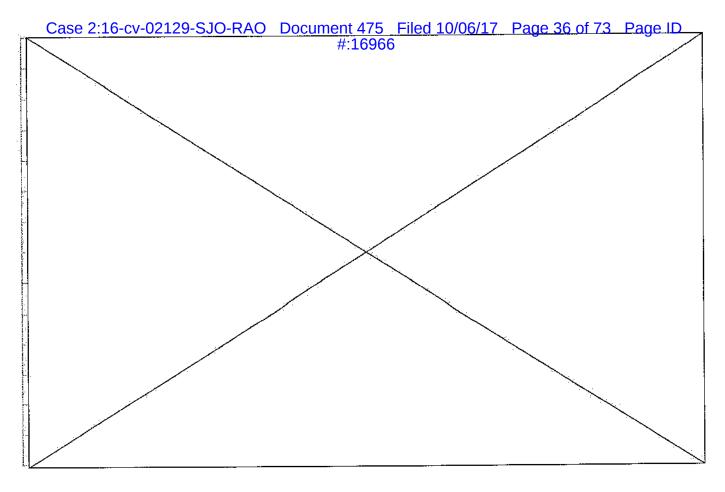












User Accounts (8)

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0	User Account	Entries	Addresses	Notes	Coleled	
1	Creation time Username: ylee64@hotmail.com					
	Service Type: 457F0987-8EB2- 4C42-8BBF-2ED8D4CE74D4					
				1	 	
2	Creation time: Usemame; sanddangdoodle@yahoo.com					
	Service Type: 6C81C579-9198- 4A88-978C-74382029CC8C					
3	Creation time Usemame: yunica			- 4		
	Service Type: SMTF					
	Server Address: smtp.me.com	i		Parameter in the control of the cont	<u> </u>	
4	Creation time Username: ykl2605					
	Service Type: SMTP		on management		4	
	Setvor Address: cutgoing.vertzon.net			The state of the s		
5	Creation time Usemane: sangdangdoodle@yahoo.com				-	
	Service Type: Find My (Phone	no mentionismo est	and the state of t			
6	Creation time	1		A CONTRACTOR OF THE PROPERTY O		
·	Usemame: ebay	1	<b>1</b>	- Luciosa de la companya de la compa	:	
	Account Name: ebay database. storage			***************************************	1	
	Service Type: Gmail webcache.				in the state of th	
[: i.a.a		di aranamente de la companya de la c	. h	A contract of the second secon		

EXHIBIT B

# Case 2:16-cv-02129-SJO-RAO Document 475 Filed 10/06/17 Page 38 of 73 Page ID

#### Notes (3)

Ħ	Time	Note	Deleted
1	Created: 8/7:2016 8:24:16 AM(UTC-7) Modified: 8/7/2016 8:25:15 AM(UTC-7)	Title: 5001 E. ocean blvd. between roycroft n argonne Body: 5001 E. ocean blvd. between roycroft n argonne	
2		Title: Body: 310, €49,  : M. 4Check. 5186 ♦ ♦% 3 17" x 11"x9.5" Length , width, height: ♦ u 2310 320 2614, April	Yeş
3	÷	Title: Body: 310 320 2614. April	Yes

#### Searched Items (4)

# Timestamp	Source	Value Daleted
1	Маря	Petco
2	Maps	
3 ;	Марз	
4	Maps	Dog park

#### SMS Messages (924)

1. \*These details are cross referenced from this device's contacts

#	Folder	Party	Time	All timestamps	Status	Message	Delete
1	Sent	To + 3889 Yoakley*	8/17/2016 11:38:04 AM(UTC- 7)		Sent	30341 camino porvenir	)   
2		+ 6889 Yoakiey	8/17/2016 11:38:01 AM(UTC- 7)		Unknown		
3	Sent	To → 8418 Nic sandovai*	8/17/2016 9:44:52 AM(UTG- 7)		Sent	Hey nic did u find out about the drains for the flat roof ?? What size they have to be n if u need an overflow (1 don't think u need an overflow because there's no parapet wall) Let me know asap because I have to get them made Do u want copper drains or is just metal ok ??	
4		+ B418 Nic.sandoval	8/17/2016 9:44:45 AM(UTG- 7)		Unknown		
5	Sent.	To +1	8/17/2016 8:27:53 AM(UTC- 7)		Sent	Great Thanks	
6		+ 0609 Dan .chairman	8/17/2016 8:27:49 AM(UTC- 7)		Unknown		
7	Inbox	From + 9609 Dan chairman*	8/17/2016 8:27:12 AM(UTC- 7)		Read	No problem. Barry will be there to help.	
8	Sent		8:17/2016 8:11:06 AM(UTC- 7)		Sent	Hi Dan good am Just wanted to let u know! will be there at ur place tomorrow also all the cars in the driveway should be moved in the am or someone has to move them when the loaders come to deliver the materials in the am ( around 10am ) Thanks	Yes
9.		+ 1000000000000000000000000000000000000	8/17/2016 8:10:59 AM(UTC- 7)		Unknown		
10	Inbox		8/17/2016 8:06:42 AM(UTC- 7)		Read	Ok	Yes
iā -	Sent		8/17/2016 8:05:17 AM(UTC- 7)		Sent	Hey Eddie, that address for sat is 2901 234th st. Torrance ca.	Yes
12-		+ 4575 Eddie . Roofer	8/17/2016 8:05:12 AM(UTC- 7)	2	Unknown	Control and Contro	
13	Inbox.		8/16/2016 5:36:49 PM(UTC- 7)		Read	HI Sang. Ive got a vendor ready to pick up your laptop and phone. I just left you a vm. Please giveme a call when you have a moment to discuss. Thanks!	Yes
14	Inbox		8/16/2016 3:43:29 PM(UTC- 7)		Read	Thanks for your payment of \$58.06 to T-Mobile! Your check was successfully processed on 08/16/16 from bank account ***9942. Your belance due is now \$0.00. Visit I-mo.co/bill to review.	Yes
15		7317 Mike Kenk . Cel	8/16/2016 2:41:34 PM(UTC- 7)		Unknown	AL-VANAMA - FRANCISCO - AL-VANAMA - AL-VAN	1
16.	Sent.	ONFIDENTIAL~ ATTO	8/16/2016 1:13:12 PM(UTG-		Sent	Thanks	Yes

xhib Exhibit B, Page34

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17	1	+1 5913 Hyuns Cel	8/16/2016 #.1 1:13:09 PM(UTC- 7)	6969 Unknown		La Company
.18	Іпрох		8/16/2016 12:28:24 PM(UTC- 7)	Read	Fax went out	Yes
19	Sent	77	8/16/2016 10:01;17:AM(UTC: 7)	Sent	Ok I will stop by after the dog park	Yes
20		+ 5913 Hyuns Cei	8/16/2016 10:01:14/AM(UTC- 7)	Unknown	The second secon	#
21	Inbox		8/16/2016 10:00:19 AM(UTC- 7)	Read	Yeah I will be	Yes
22	Inbox		8/16/2016 10:00:11:AM(UTC- 7)	Read	Office suite no 310	Yes
23	Inbox		8/16/2016 9:59:50 AM(UTC- 7)	Read	310	Yes
24	Sent		8/16/2016 9:59:40 AM(UTC- 7)	Sent	Ru going:to be there between 10:30noon n what # r u.in ?	Yes
25		Hyunş Çel	8/16/2016 9:59:36 AM(UTC-	Unknown	And the state of t	
26	Inbox	75. 27. 38. 54. 54. 54. 54. 54. 54. 54. 54. 54. 54	7) 8/16/2016 9:58:23 AM(UTC- 7)	Read	I am dentist office and will be back in 10 min	Yes
27		4273	8/16/2016 9:57:30 AM(UTC- 7)	Unknown	The state parties are as a contract to the contract to the contract and the contract and the contract to the contract and the	-10-170
28		Hyuns Cel	8/16/2016 9:48:21 AM(UTC: 7)	Unknown	A CONTRACTOR OF THE CONTRACTOR	1
29	Inbax		8/15/2016 10:46:30 AM(UTC- 7)	Read	Cool, Thx man	Yes
30	Sent		8/15/2016 10:36:53 AM(UTC- 7)	Sent	Will call u soon with the update on the roofer up in Oregen	Yes
31		\$611 Steve Henry	8/15/2016 10:36:49 AM(UTC- 7)	Unknown	A 1800 Marie Communication of the Communication of	İ
32		4739. Yun's, Cel	8/15/2016 10:01:51 AM(UTC- 7)	Unknown		
33.		700 4739 Yunis, Cel	8/15/2016 10:01:17 AM(UTG- 7)	Unknown		
34		Chachy 9561	8/13/2016 3:19:39 PM(UTC- 7)	Unknown		
35		Stephanie / Maggies Ass	8/12/2016 2-45:30:PM/UTC-	Unknown		
36		2102	7) 8/12/2016 12:48:16 PM(UTC- 7)	Unknown		
37		2102	8/12/2016 12:22:12 PM(UTC-	Unknown		
38		+ 2102	7)   8/12/2016   12:17:47 PM(UTC-   7)	Unknown		
39		2102	8/12/2016 11:17:35 AM(ÚTC- 7)	Unknown		100 mag
40		Tell helth	8/6/2016 5:07:41 PM(UTC- 7)	Unknowr		
41		9103 Jell Pelly	8/6/2016 10:55:14 AM(UTC- 7)	Unknowi		
42	-	Jeff Petty	8/5/2016 4:34:56:PM(UTC- 7)	Unknown		
43		Jeff Petty	8/5/2016 4:34:40 PM(UTC- 7)	Unknowi	The state of the s	
44		9561 Chachy	8/5/2016 9:28:04 AM(UTC- 7)	Unkпowr		
45		Chachy	8/5/2016 9:26:05 AM(UTC- 7)	Unknowr		
46	***************************************	Bay Harbor Roofing / Art Gonzales	8/5/2016 8:43:22 AM(UTC- 7)	Unknows	1	
47		9581 Chachy	8/4/2016 6:05:30.PM(UTC- 7)	Unknowi	1	

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48		1711 Conan	8/4/2016   12:25:51 PM(UTC-   7)	#:16970	Unknown		
49	\	171:1 Gonan-	8/4/2016 9:22:08.AM(UTC- 7)	V-15-16-2-17-17-17-17-17-17-17-17-17-17-17-17-17-	Unknown		
50)	VI CONTRACTOR OF THE CONTRACTO	1.71.1 Conan	8/3/2016 6:31:09 PM(UTC- 7)		Unknown		
51		6889 Yoakley	8/3/2016 6:22:18 PM(UTC- 7)		Unknown	kada kada 1985 - Ang pagara ana ana ana ana ana ana ana ana ana	
52		Conan	8/3/2016 6:15:58 PM(UTC- 7)	ean anna marine ann an ann an ann an	Unknown	and the state of t	\$
53.		1711 Conan	8/3/2016 6:08:33:PM(UTC- 7)		Unknown		BOTT
54		9561 Chachy	8/3/2016 9:55:01 AM(UTC- 7)		Unknown	oog viimiga maa maa maanii kaabaa addi kaabaa kaabab Poogenyi o Mikaaliin maa maa didhaab	1
55	1	Hyuns Cel	8/2/2016 9:51:05 AM(UTC- 7)		Unknown	and the second s	Ì
56		8418 Nic sandoval	8/2/2016 9:38:32 AM(UTC- 7)		Unknewn	por manuscus and the state of t	
57	Inbex		8/2/2016 9:24:40 AM(UTC- 7)		Read	2 with Dan	Yes
58	Inbox	)	8/2/2016 9:24:22 AM(UTC- 7)		Read	Yeah	Yes
59	Inbox	1	8/2/2016 9:24:12 AM(UTC- 7)	A THE STATE OF THE	Unread	And then meet with Eddle at 3?	Yes
60	linbox,		8/2/2016 9:23:58 AM(UTC- 7)		Read	Yes with Dan	Yes
61	Inbox		8/2/2016 9:23:51 AM(UTC- 7)		Read	t can suggest to meet Dan today at 2 for consultation	Yes
62	lnbox		8/2/2016 9:23:42 AM(UTC- 7)		Upread.	With Dan?	Yes
63	Inbox		8/2/2016 9:23:18 AM(UTC= 7)		Read	Shall I ask for short consultation? In order for him to do it sang needs to sigh paper I believe. Agreement retaining???	Yes
64	Inbox		8/2/2016 9:22:16 AM(UTG- 7)		Unread	So Dari Crowley needs to contact faimers	Yes
66	Inbox.		8/2/2016 9:22:16 AM(UTC- 7)	period of the second of the se	Unread	If you want to delay meeting with Eddle, we should 0 (_U 0 < U U E47C39A2-FFC	Yes
66	Inbox	1	8/2/2016 9/21:34 AM(UTC- 7)		Read	Right	Yes
67	Inbox		8/2/2016 9:21:13 AM(UTC- 7)		Unread	In the ROR letter, I think it said for our preferred independent agent to contact the adjustor.	Yes
68	Inbox	3	8/2/2016 9:20:13: AM(UTC- 7)		Read	We would need to sign paper and give Farmers ins details to him. I am told that they typically negotiate fees with insurance co	Yes
69	Inbox		8/2/2016 9:19:18 AM(UTC- 7)		Read	Greg suggested	Yes
70	Inbox	ALL BOOK OF THE PROPERTY OF TH	8/2/2016 9:19:07 AM(UTC- 7)		Unread	Has he been approved as independent counsel by Farmers?	Yes
71	inbox		8/2/2016 9:18:56 AM(UTC- 7)		Read	I talk to him with Greg last Friday	Yes
72	Inbox		8/2/2016 9;18;30 AM(UTC- 7)		Unread	Why? When are we meeting the independent counset? You've talked to him?	Yes
73	Inbox	5	8/2/2016 9:17:06 AM(UTC- 7)		Read	My friend Greg suggested to nieet with independent counsel first before meeting Eddie	Yes
74	Inbox	Paracetosacione in interior paracetos compana	8/2/2016 8:33:55 AM(UTC- 7)		Read	Sang, do you mind?	Yes
75	Inbox	A ATTIMATE OF THE PARTY OF THE	8/2/2016 8:33;31 AM(UTG- 7)		Read	Ask sang. But don't see any problem	Yes
76	• • • • • • • • • • • • • • • • • • •	Nic sandoval	8/1/2016 6:24:01 PM(UTC- 7)		Unknowin		
77		Nic sandoval	8/1/2016 9:04:36 AM(UTC- 7)		Unknown	and the control of th	
78		Nic sandoval	7/31/2016 9:23:48 AM(UTC- 7)		Unknown	<u>{</u>	

76

#### Case 2:16-cv-02129-SJO-RAO Document 475 Filed 10/06/17 Page 41 of 73 Page ID

79	Ray ( Dog Park )	7/30/2016 11:28:07 AM(UTC- 7)	#:16971	Unknown	
30	Ray ( Dog Park )	7/30/2016 11:06:56 AM(UTC- 7)		Unknown	
31	1949 Ray ( Dog Park )	7/29/2016 1:29:06 PM(UTC- 7)		Unknown	
32	1957 Franky ferrara	7/29/2016 9:18:52 AM(UTC-7)		Unknown	
33	0609 Dan .chairman	7/29/2016 9:16:30 AM(UTC- 7)		Unknown	
34	1957 Franky ferrara	7/29/2016 8:59:23 AM(UTC-7)		Unknown	
35	4575 Eddie . Roofer	7/28/2016 3:57:16 PM(UTC- 7)		Unknown	
36	1949 Ray ( Dog Park )	7/26/2016 11:20:29 AM(UTC- 7)		Unknown	
37	Ray ( Dog Park )	7/26/2016 11:19:33 AM(UTC- 7)		Unknown	
38	2282	7/25/2016 3:58:12 PM(UTC- 7)		Unknown	
39	4575 Eddie . Roofer	7/25/2016 9:26:54 AM(UTC- 7)		Unknown	
90	2586 Bob Teer Realtor	7/24/2016 8:50:19 PM(UTC- 7)		Unknown	
91	4575 Eddie . Roofer	7/24/2016 4:38:14 PM(UTC- 7)		Unknown	
92	Yun's. Cel	7/22/2016 12:58:19 PM(UTC- 7)		Unknown	
93	4739 Yun's. Cel	7/22/2016 11:59:54 AM(UTC- 7)		Unknown	
94	4739 Yun's. Cel	7/22/2016 11:47:58 AM(UTC- 7)		Unknown	
95	Yoakley	7/20/2016 4:31:19 PM(UTC- 7)		Unknown	
96	7276 Charlie ferrara	7/20/2016 6:51:09 AM(UTC- 7)		Unknown	
97	7276 Charlie ferrara	7/20/2016 6:23:49 AM(UTC- 7)	Г	Unknown	
98	5611 Steve Henry	7/18/2016 10:22:28 AM(UTC- 7)		Unknown	
99	3906 Eric. Jaemasons	7/14/2016 9:10:20 AM(UTC- 7)		Unknown	
100	3906 Eric. Jaemasons	7/13/2016 3:27:43 PM(UTC- 7)		Unknown	
101	3906 Eric. Jaemasons	7/13/2016 3:24:24 PM(UTC- 7)		Unknown	
102	5611 Steve Henry	7/9/2016 10:28:40 PM(UTC- 7)		Unknown	
103	Steve Henry	7/9/2016 2:15:47 PM(UTC- 7)		Unknown	
104	Dan .chairman	7/9/2016 11:41:46 AM(UTC- 7)		Unknown	
105	5611 Steve Henry	7/8/2016 11:33:30 AM(UTC- 7) 7/7/2016		Unknown	
106	Dan .chairman	10:18:08 PM(UTC- 7) 7/6/2016		Unknown	
107	Bay Harbor Roofing / Art Gonzales	11:45:22 AM(UTC- 7) 7/6/2016		Unknown	
108	1812	7/6/2016 11:38:02 AM(UTC- 7) 7/6/2016		Unknown	
109	Bay Harbor Roofing / Art Gonzales LY CONFIDENTIAL - ATTOR	9:29:46 AM(UTC- 7)			Lee00000673

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110		1659 Bay Harbor Roofing / Art Gonzales	7/6/2016 9:24:04 AM(UTC- 7)	#:16972 Unknow		
111		1659 Bay Harbor Roofing / Art Gonzales	7/6/2016 9:23:42 AM(UTC- 7)	Unknov	m	
112	Inbox	7.11 551.111105	7/1/2016 3:41:29 PM(UTC- 7)	Unrea	A82525B5-51B9-4A74-83D2- DCEDD7D7683EOn PCH between TJ's and narbonne. S	Yes
113	Inbox		7/1/2016 3:41:29 PM(UTC- 7)	Unrea		Yes
114	Inbox		7/1/2016 3:40:48 PM(UTC-	Unrea	d Tocco	Yes
115	Inbox		7) 7/1/2016 3:40:44 PM(UTC-	Unrea	d Where is Rocco	Yes
116	Inbox		7) 7/1/2016 3:38:52 PM(UTC-	Unrea	d If you're not busy, maybe stop at Tocco and get mom's hair color done?	Yes
117	Inbox		7) 7/1/2016 3:37:26 PM(UTC-	Unrea	d She said yes.	Yes
118	Inbox		7) 7/1/2016 3:36:54 PM(UTC-	Unrea	d Will she be able to walk in Europe	Yes
119	Inbox		7) 7/1/2016 3:36:38 PM(UTC-	Unrea	d 3 weeks	Yes
120	Inbox		7) 7/1/2016 3:36:27 PM(UTC-	Read	Sigh. For how long?	Yes
121	Inbox		7) 7/1/2016 3:36:26 PM(UTC-	Unrea	d Still not fused. Takes 6 weeks to heal	Yes
122		Allen Johnson	7) 6/30/2016 2:06:51 PM(UTC-	Unknov	vn	
123		3303 Allen Johnson	7) 6/30/2016 2:05:44 PM(UTC-	Unknov	vn .	
124		7276 Charlie ferrara	7) 6/30/2016 1:54:34 PM(UTC-	Unknov	vn	
125		3303 Allen Johnson	7) 6/30/2016 1:38:39 PM(UTC-	Unknov	vn .	
126		1505 Patch	7) 6/28/2016 10:25:58 AM(UTC-	Unknov	vn	
127		1505 Patch	7) 6/28/2016 10:20:50 AM(UTC-	Unknov	vn	
128		1505 Patch	7) 6/27/2016 11:21:19 PM(UTC-	Unknov	vn	
129		3195	7) 6/27/2016 3:17:37 PM(UTC-	Unknov	vn	
130		2264 Chris / Nic's Wrkr	7) 6/27/2016 3:15:27 PM(UTC- 7)	Unknov	vn	
131		3906 Eric. Jaemasons	6/24/2016 9:15:38 AM(UTC-7)	Unknov	yn .	
132		0254	6/23/2016 3:33:48 PM(UTC- 7)	Unknov	yn	
133		7669 Annette	6/21/2016 9:40:30 AM(UTC- 7)	Unknov	yn	
134		7669 Annette	6/21/2016 8:44:03 AM(UTC-7)	Unknov	vn	
135		0626 Bruce Turner	6/21/2016 8:43:49 AM(UTC- 7)	Unknov	yn .	
136		7669 Annette	6/20/2016 7:47:50 PM(UTC- 7)	Unknov	vn	
137		7669 Annette	6/20/2016 7:05:41 PM(UTC- 7)	Unknov	vn	
138		4948 Dave Schlichter	6/20/2016 9:44:22 AM(UTC-7)	Unknov	vn	
139		4948 Dave Schlichter	6/20/2016 9:31:59 AM(UTC- 7)	Unknov	vn .	
140		9656 Alex Grey	6/18/2016 4:51:56 PM(UTC- 7)	Unknov	vn	

#### Case 2:16-cv-02129-SJO-RAO Document 475 Filed 10/06/17 Page 43 of 73 Page ID

	Se 2.10-CV-02129-330-		U 4 00 TO		
141	Alex Grey	6/18/2016 4:43:11 PM(UTC- 7)	#:16973 Unknown		and the second s
142	Alex Grey	6/18/2016 4:40:14 PM(UTC- 7)	Unknown		
143	1986	6/17/2016 2:36:54 PM(UTC- 7)	Unknówa		
144	1986	6/17/2016 10:05:11 AM(UTC- 7)	Unknown		
145	Annette 7869	6/15/2016 8:36:45 AM(UTC- 7)	Unkriown	1	
146	0254	6/14/2016 10:10:07 AM(UTC- 7)	Unkriown	1	
147	3254	6/14/2016 10:08:20 AM(UTC- 7)	Unknown		
148	1986	6/13/2016 3:13:18 PM(UTC- 7)	Unknown	1	
149	9656 Alex Grey	6/11/2016 1:14:55 PM(UTC- 7)	Unknown		
150	9656 Alex Grey	6/11/2016 10:47;41 AM(UTC- 7)	Unknown	1	
151	1948 Dave Schlichter	6/8/2016 2:29:59:PM(UTC- 7)	Unknown	1	
152	8744 Hyun	6/5/2016. 7:08:30 PM(UTC- 7)	Unknown	7	
153	8744 Hyun	6/5/2016 7:08:13 PM(UTC- 7)	Unknown	7	
154	0626 Bruce Turner	5/30/2016 12:57:59 PM(UTC- 7)	Unknown	7	
155	0626 Bruçe Turner	5/30/2016 10:09:13.AM(UTC- 7)	Unknown		
156	John Camplan	5/30/2016 9:54:06 AM(UTC- 7)	Unknown	3	
157	John Camplan	5/27/2016 4:19:49 PM(UTC- 7)	Unknown	7	
158	74001 John cook.	6/17/2016 9:20:27 PM(UTC- 7)	Unknown	1	
159	John cook,	5/17/2016 9:18:42-PM(UTC- 7)	Unknown	1	
160	3695 Tommy Greënwood ₹ Gives Referals n handyman	5/17/2016 8:42:47 PM(UTC- 7)	Unknown	3	
.161	3695 Torruny Greenwood / Gives Referals n handyman	5/17/2016 8:41:28 PM(UTC- 7)	Unknown	7	
162	3695 Tommy Greenwood / Gives Referals n fiandynian	5/17/2016 7:47:39 PM(UTC- 7)	Unknown	7	
163	Lily Gecere	5/9/2016 4:55:28 PM(UTC- 7)	Uriknown	7	
164	#######74001 John cook.	5/8/2016 6:27:02 PM(UTC- 7)	Unknöwt		
165	74901 John cook.	5/8/2016 5:47:58 PM(UTC- 7)	Unknown	7	
166	90670 Tony Huh.	5/8/2016 3:24:59.PM(UTC- 7)	Unknown	1	
167	<b>2002 9</b> 0670 Tony Huh	5/8/2016 3:23:09 PM(UTC- 7)	Unknown		
168	Tony Huh	5/8/2016 3:15:52 PM(UTC- 7)	Unknown	and the state of t	w · · . • · . · . • . • . · · · · · ·
169	Tony Huh	5/8/2016 3:14:08 PM(UTC- 7)	Unknown		
170	90670 Tony Huh	5/8/2016 3:11:14 PM(UTG- 7)	Unknown	1	
				• .	~00000875

"HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY"

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171	5138 Lily Cecere	5/6/2016 5:15:40 PM(UTC- 7)	#:16974	Jnknown	
172	5138 Lily Cecere	5/6/2016 4:56:58 PM(UTC- 7)	l	Jnknown	
173	2264 Chris / Nic's Wrkr	5/4/2016 12:48:06 PM(UTC- 7)	Į.	Unknown	
174	4575 Eddie . Roofer	5/3/2016 5:22:40 PM(UTC- 7)	l	Unknown	
175	J Young	5/2/2016 6:56:35 PM(UTC- 7)	·	Unknown	
176	J Young	5/2/2016 6:14:50 PM(UTC- 7)	ı	Unknown	
77	J Young	5/2/2016 3:33:42 PM(UTC- 7)		Unknown	
178	7317 Mike Kenk . Cel	5/1/2016 9:32:56 AM(UTC- 7)		Unknown	
179	7317 * Mike Kenk . Cel	5/1/2016 9:26:04 AM(UTC- 7)	Į.	Unknown	
180	Patch 1505	4/27/2016 9:43:02 PM(UTC- 7)	Į.	Unknown	
181	1505 Patch	4/27/2016 9:42:51 PM(UTC- 7)	Į.	Unknown	
182	4162 Ray	4/27/2016 4:16:24 PM(UTC- 7)		Unknown	
183	7208 Gopher, Jeff	4/27/2016 4:14:58 PM(UTC- 7)		Unknown	
184	7208 Gopher. Jeff	4/27/2016 4:13:17 PM(UTC- 7)		Unknown	
185	7208 Gopher, Jeff	4/27/2016 4:11:38 PM(UTC- 7)		Unknown	
186	Allen Johnson	4/25/2016 9:45:54 AM(UTC- 7)		Unknown	
187	Chris. Pv Bowl	4/24/2016 12:12:40 PM(UTC- 7)		Unknown	
188	Hoey 0177	4/24/2016 9:30:03 AM(UTC- 7)		Unknown	
189	Allen Johnson	4/24/2016 8:21:56 AM(UTC- 7)		Unknown	
190	Hoey 0177	4/24/2016 7:39:04 AM(UTC- 7)		Unknown	
191	Hoey 0177	4/24/2016 7:37:20 AM(UTC- 7)		Unknown	
192	5138 Lily Cecere	4/22/2016 6:51:18 PM(UTC- 7)		Unknown	
193	7022	4/22/2016 4:12:09 PM(UTC- 7)		Unknown	
194	7022	4/21/2016 5:22:59 PM(UTC- 7)	A STATE OF THE STA	Unknown	
195	7022	4/21/2016 5:21:50 PM(UTC- 7)		Unknown	
196	9621	4/21/2016 4:09:34 PM(UTC- 7)		Unknown	
197	Franky ferrara	4/18/2016 9:33:23 AM(UTC- 7)		Unknown	
198	Franky ferrara	4/18/2016 8:56:18 AM(UTC- 7)		Unknown	
199	Hoey	4/15/2016 11:32:04 AM(UTC- 7)		Unknown	
200	9245 Julian . Tear Off Co	4/14/2016 3:13:41 PM(UTC- 7)		Unknown	
201	9245 Julian . Tear Off Co	4/14/2016 2:38:17 PM(UTC- 7)		Unknown	Lee00000676

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202	7934 Brant B.	4/12/2016 10:03:07 AM(UTC-	 Unknown	r rage 45	0173 10	ige ib
203	3940	7) 4/10/2016	Unknown			
204	J Young	8:38:32 PM(UTC- 7) 4/10/2016	Unknown			
204	J Young	8:31:15 PM(UTC- 7)	Onknown			
205	Hoey 0177	4/10/2016 6:48:14 PM(UTC- 7)	Unknown			
206	6957 Mort Hansen	4/8/2016 6:40:50 PM(UTC- 7)	Unknown			
207	6957 Mort Hansen	4/8/2016 5:41:57 PM(UTC- 7)	Unknown		ung shilingy	
208	7022	4/8/2016 8:53:40 AM(UTC-7)	Unknown			
209	7022	4/8/2016 8:47:40 AM(UTC- 7)	Unknown			
210	0075 Maggie Ding Cel	4/7/2016 10:00:09 AM(UTC- 7)	Unknown			
211	0075 Maggie Ding Cel	4/7/2016 9:58:13 AM(UTC-7)	Unknown			
212	2453 Fred Partridge	4/6/2016 10:01:24 PM(UTC- 7)	Unknown			
213	5878 Mel	4/6/2016 8:52:35 PM(UTC-7)	Unknown			
214	5878 Mel	4/6/2016 6:17:17 PM(UTC- 7)	Unknown			
215	John / Chris's Brother	4/5/2016 12:55:23 PM(UTC- 7)	Unknown			
216	John lee	4/4/2016 7:41:14 PM(UTC- 7)	Unknown			
217	3454 Daniel / Jaimason MC	4/4/2016 3:01:55 PM(UTC- 7)	Unknown			
218	4537 Lammy	4/2/2016 2:29:14 PM(UTC- 7)	Unknown			
219	0075 Maggie Ding Cel	4/1/2016 5:31:43 PM(UTC- 7)	Unknown			
220	0075 Maggie Ding Cel	4/1/2016 5:23:56 PM(UTC- 7)	Unknown			
221	0075 Maggie Ding Cel	4/1/2016 5:21:35 PM(UTC- 7)	Unknown			
222	6059	4/1/2016 8:46:27 AM(UTC- 7)	Unknown			
223	6059	4/1/2016 8:43:10 AM(UTC- 7)	Unknown			
224	6059	4/1/2016 8:42:25 AM(UTC- 7)	Unknown			
225	4549	4/1/2016 8:19:23 AM(UTC- 7)	Unknown			
226	9245 Julian . Tear Off Co	4/1/2016 7:30:27 AM(UTC- 7)	Unknown			
227	1957 Franky ferrara	3/31/2016 4:32:12 PM(UTC- 7)	Unknown			
228	Mel 5878	3/30/2016 2:43:55 PM(UTC- 7)	Unknown			
229	5878 Mel	3/30/2016 2:40:20 PM(UTC- 7)	Unknown			
230	14990 Scott finley	3/30/2016 2:36:50 PM(UTC- 7)	Unknown			
231	4990 Scott finley	3/30/2016 2:31:17 PM(UTC- 7)	Unknown			
232	5878 Mel	3/30/2016 12:42:00 PM(UTC- 7)	Unknown			

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	10-04-02129-000-				aga . a a	
233	4855 Doug kinnion	3/30/2016 12:34:47 PM(UTC- 7)	#:16976	Unknown		
234	1353 George Brant	3/28/2016 2:29:40 PM(UTC- 7)		Unknown		
235	1767 Riggler	3/27/2016 3:41:50 PM(UTC- 7)		Unknown		
236	1767 Riggler	3/27/2016 3:38:42 PM(UTC-7)		Unknown		
237	3454 Daniel / Jaimason MC	3/27/2016 9:34:58 AM(UTC-7)		Unknown		
238	9535 Feldy	3/27/2016 8:40:51 AM(UTC-7)		Unknown		
239	8362	3/27/2016 8:23:34 AM(UTC-7)		Unknown		
240	8362	3/27/2016 8:22:36 AM(UTC- 7)		Unknown		
241	4537 Lammy	3/26/2016 10:27:11 AM(UTC- 7)		Unknown		
242	4537 Lammy	3/26/2016 10:16:24 AM(UTC- 7)		Unknown		
243	3454 Daniel / Jaimason MC	3/25/2016 7:21:02 PM(UTC- 7)		Unknown		
244	3454 Daniel / Jaimason MC	3/25/2016 7:10:06 PM(UTC- 7)		Unknown		
245	5102 John Camplan	3/25/2016 7:41:30 AM(UTC- 7)		Unknown		
246	7934 Brant B.	3/25/2016 6:26:20 AM(UTC- 7)		Unknown		
247	2918 Anthony Bukema	3/24/2016 9:20:27 PM(UTC- 7)		Unknown		
248	3281 Ringer	3/24/2016 8:47:50 PM(UTC- 7)		Unknown		
249	8362	3/24/2016 7:42:03 PM(UTC- 7)		Unknown		
250	3281 Ringer	3/24/2016 4:05:10 PM(UTC- 7)		Unknown		
251	6889 Yoakley	3/24/2016 3:14:53 PM(UTC- 7)		Unknown		
252	2918 Anthony Bukerna	3/24/2016 2:18:52 PM(UTC- 7)		Unknown		
253	3195	3/24/2016 7:39:09 AM(UTC- 7)		Unknown		
254	4537 Lammy	3/24/2016 7:38:25 AM(UTC- 7)		Unknown		
255	3195	3/24/2016 7:35:45 AM(UTC- 7)		Unknown		
256	4537 Lammy	3/24/2016 7:33:21 AM(UTC- 7)		Unknown		
257	Losi Cel 3362	3/24/2016 7:23:23 AM(UTC- 7)		Unknown		
258	5056 Frank riley cel.	3/23/2016 7:39:01 PM(UTC- 7)		Unknown		
259	3906 Eric. Jaemasons	3/23/2016 7:37:07 PM(UTC- 7)		Unknown		
260	6790 Knuckles	3/23/2016 3:21:36 PM(UTC- 7)		Unknown		
261	9245 Julian . Tear Off Co	3/23/2016 9:41:18 AM(UTC- 7)		Unknown		
262	9245 Julian . Tear Off Co	3/23/2016 9:35:33 AM(UTC- 7)		Unknown		
263	2449	3/21/2016 11:10:03 AM(UTC- 7)		Unknown		

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				······································		P. 1. A. P. S. C. A. C.	· Service · · · · · · · · · · ·
284		3608.	3/19/2016 11:21:43 AM(UTC- 7)	#:16977	Unknewn		
265		3608	3/18/2016 4:12:58 PM(UTC- 7)		Unknown		
266		2059 Paps.	3/17/2016 2:28:45 PM(UTC-		Unknown		
267		1229 Ant	7) 3/17/2016 12:58:45 PM(UTC- 7)	1	Unkaown		
268	Para tan 1860 (1864) and 1864 (1864) and 1864	1229 Ant	3/17/2016 12:57:24 PM(UTC- 7)		Unknown		
269		2918 Anthony Bukema	3/16/2016 4:22:27 PM(UTC- 7)		Unknown		
:270		Camaryn	3/16/2016 2:29:33 PM(UTC- 7)		Unknown		
271		1229 Ant	3/16/2016 1:05:24 PM(UTC- 7)	5	Unknown		
272		a790 Knuckles	3/15/2016 9:20:07 PM(UTC- 7)		Unknown		
273		1035	3/15/2016 7:58:91 PM(UTC- 7)		Uriknown	The state of the s	
274		1767 Riggler	3/15/2016 4:19:57 PM(UTC- 7)	1   	Unknown	and the second s	
275		1767 Riggler	3/15/2016 3:56:53 PM(UTC- 7)		Unknown		j
276		1767 Riggler	3/15/2016 3:45:28 PM(UTC- 7)	,	Unknown		[
277		5549	3/15/2016 3:40:27 PM(UTC- 7)	1 1 1	Unknown	AND A LEGICAL CONTRACTOR CONTRACT	
278		6790 Knuckles	3/15/2016 3:27:57 PM(UTC- 7)		Unknown	- Charles (Control of the Control of	
279		6790. Knuckles	3/15/2016 2:54:56 PM(UTC- 7)		Unknowa	The state of the s	
280		8790 Knuckles	3/15/2016 2:52:35 PM(UTC- 7)	10 \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	Unknown	and the second s	
281		3949 Brian Hong / Realter n Manag Co / Tom Lee	3/14/2016 5:58:43 PM(UTC- 7)		Unknown	ar da sakata sasar - att daga pa manamada Malamata Ariga (15 anga 16 anga 16 anga 16 anga 16 anga 16 anga 17 a	
282	A Quarter as recommended as a second as recommended as a second as	3949 Brian Hong / Realtor n Manag Co / Tom Lee	3/14/2016 5:57:32 PM(UTC- 7)		Unknown	The second day and the second	,
283	4	1179 Pele babros	3/14/2016 5:28:20 PM(UTC- 7)		Unknown		
284		1179 Pete babros	3/14/2016 5:07:57 PM(UTC-		Unknown		
285		3362 Losi Cel	3/14/2016 11:58:30 AM(UTC- 7)		Unknown		
285		2818 Fredy	3/14/2016 9:32:54 AM(UTC- 7)		Unknown	A A PARAGEMENT COLUMN TO THE C	
287	Inbox		3/13/2016 4:14:57 PM(UTC- 7)		Read	Sending my codollences, an deepest sympathies, an regaurds, as you an your family go through these difficult times. Fred straeter.	Yes
288	Inbox		3/13/2016 3:56:15 PM(UTC- 7)		Read	We wanna order dinner with you txt us	Yes
289	Inbox	14	3/13/2016 3:39/49 PM(UTC- 7)		Read	Cool	Yès
290	Sent		3/13/2016 3:38:34 PM(UTC- 7)		Sent	Ok Will call u in a little bit	Yes
291	Sent		3/13/2016 3:38:12 PM(UTC- 7)		Sent	and the second s	Yes
292	xodn	A	3/13/2016 3:37:43 PM(UTC- 7)	<u> </u>	Read	5.30	Yes
293	xodnl		3/12/2016 3:50:34 PM(UTC- 8)		Read	Hi Sang-just want you to know that you and your family are in mine and denny's prayers.	Yes
294	Inbox:		3/12/2016 11:17:58 AM(UTC- 8)	- 24-74	Read	Hi Sang, lamat Charlle's gonna rest up for an hour and go back out, how are you? Call me!	Yes

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295	Inbox		3/11/2016 11:36:22 PM(UTC- 8)	#:16978	Read	See email. It includes photos and roof information.	Yes
296		2449	3/11/2016 8:30:13 PM(UTC- 8)		Únknown	The state of the s	
297		2449	3/11/2016 4:57:46 PM(UTC-		Unknown	The second secon	
298		2449	3/11/2016 4:55:48 PM(UTC- 8)	,	Unknown	and the second s	
299		2449	5/11/2016. 4:54:57 PM(UTC-		Unknowa	AND	
300		5005 Jason s.	3/11/2016 1:57:58 PM(UTC- 8)		Uпкпоwn	in a series of the series of t	- \$4
30.1	Sent		3/11/2016 12:42:13 PM(UTC- 8)	AND THE PROPERTY OF THE PROPER	Sent	Hi-Riggs hope all is well Hey the service is going to be on Tues (15th) at green hills in the lime is going to be between 11:30 am - 1:30 pm We have to figure out the timeline for the service later today with the pastor but I will tell u more specific time for ur slot later today or tomorrow am Also Eric how do u spell ur name ?? Again from the bottom of my heart thank you for doing this for me n my family	Yes
302	прох		3/11/2016 12:09;52 PM(UTC- 8)		Read	Hey Sang. Can we have you out to two properties? 418 Lucia Ave in Redondo beach to fix a rain gutter and then 2259 Josie Ave in Long Beach for a roof inspection? You can go to Josie anytime. Lucia we'll need to let the owners know when you plan to stop by. Call me if you have questions. Thanks!	Yes
303	Sent		3/10/2016 2:35:49 PM(UTC- 8)		Sent	Thank u very much	Yes
304	Inbox		3/10/2016 2:34:37 PM(UTC- 8)		Read	No wornes, Seng. I hope the dates work out. I'll be there for you.	Yes
305	Sent		9/10/2016 2:23:59 PM(UTC- 8)		Sent	Thank you so much Eric , it would mean so much to me n my family ( n my dad also ) to hear u, play the pipes at the service Thanks again n I will let u know the date tomorrow after niy mom meets with the people at green hills Take care n thanks again from the bottom of my heart	Yes
306	<u></u>	7490	3/10/2016 12:41:21 PM(UTG- 8)		Unknown	A CONTRACTOR OF THE CONTRACTOR	
307		John lee	3/10/2016 9:22:05 AM(UTC- 8)	William Control of the Control of th	Unknown	and the second s	
308		3261 John lee	3/10/2016 7;03:45 AM(UTC- 8)		Unknown	And the second s	1
309		John lee	3/10/2016 5:17:03 AM(UTC- 8)		Unknown		1
310		9263	3/7/2016 10:15:41 AM(UTG- 8)		Unknown		
314	1	3362. Losí Cel	3/7/2016 9;29:18 AM(UTC- 6)		Ünknown		
372		9263	3/7/2016 9:28:02 AM(UTC- 8).		Unknown		
313		3263	3/7/2016 9:13:18 AM(UTC- 8)		Unknown		<u> </u>
314		B920 Donna	3/1/2016 7:56:67 PM(UTC- 8)		Unkhawn		
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316		1351	2/29/2016 8:57:17 PM(UTC- 8)		Unkhown		10 1-2110111431134
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318	************************************	8d 3194	2/29/2016 5:59:08 PM(UTC- 8)	NO. 1886. 1888 DE 1976. 1976. 1976. 1976. 1976. 1976. 1976. 1976. 1976. 1976. 1976. 1976. 1976. 1976. 1976. 19	Unknown		-
319		7317 Mike Kenk , Cel	2/29/2016 4:37:48 PM(UTG- 8)		Uniknowit		
320		Evan Levy	2/29/2016 4:52:35 PM(UTC- 8)		Unknown		
321		peterb@remed.com pete babros NFIDENTIAL ATTORI	2/29/2016 4:32:35 PM(UTC- 8)		Unknown	Lee000000	\$80°

#### Case 2:16-cv-02129-SJO-RAO Document 475 Filed 10/06/17 Page 49 of 73 Page ID

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714	2745	10/12/2014 2:08:10 PM(UTC- 7)	Unknown	
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716	2745	10/12/2014 7:52:41 AM(UTC- 7)	Unknown	
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#### Case 2:16-cv-02129-SJO-RAO Document 475 Filed 10/06/17 Page 62 of 73 Page ID

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886	5102 John Camplan	3/19/2014 1:59:13 PM(UTC- 7)		Unknown	and the first of the second	Yes
887	5102 John Camplan	3/19/2014 10:52:07 AM(UTC- 7)		Unknown	NAC   1   1   1   1   1   1   1   1   1	Yes
888	1400 Fernando, T.o.	3/19/2014 9:41:35 AM(UTC- 7)		Unknown		
889	5611 Steve Henry	3/19/2014 9:40:39 AM(UTC- 7)		Unknown	www.min.com	Yes
890	4014 Chris, Pv Bowl	3/19/2014 8:20:14 AM(UTC- 7)		Unknown	AND TO A STATE OF THE PROPERTY	Yes
891	4014 Chris. Pv Bowl	3/19/2014 8:09:19 AM(UTC- 7)		Unknown		Yes
892	2859	9/18/2014 9:09:07 AM(UTC- 7)		Unknown		
893	Fernando T.o.	3/18/2014 8:52:38 AM(UTC- 7)		Unknown	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
894	Julian , Tear Off Co*	3/17/2014 3:19:51 PM(UTC- 7)		Unknown		Yes
895	Julian , Tear Off Co*	3/17/2014 3:17:54 PM(UTC- 7)		Unknown		Yes
896	2059 Paps	3/17/2014 9:41:32 AM(UTC- 7)		Unknown		Yes
897	7307	3/17/2014 7:27:26 AM(UTC- 7)		Unknown		
898	7307	3/16/2014 4:56:47 PM(UTC- 7)		Unknown		
899	John Campian	3/16/2014 4:49:00 PM(UTC- 7)		Unknown		Yes
900	7307	3/16/2014 9:30:40 AM(UTC- 7)		Unknown		
901	7307	3/16/2014 9:29:15 AM(UTC- 7)		Unknown		
902	7307	3/16/2014 9:27:45: AM(UTC- 7)		Unknown		
903	Yun's. Cel	3/15/2014 6:57:47 PM(UTC- 7)		Unknown		Yes
904	Yun's, Cel	3/15/2014 6:66:29 PM(UTG- 7)		Unknown	The state of the s	Yes
905	4739 Yun's, Cel	3/15/2014 6:51:46 PM(UTC- 7)		Unknown		Yes
906	0699	3/15/2014 6:20:07 PM(UTC- 7)		Unknown		
907	7208 Gopher, Jeff	3/14/2014 B:46:40.PM(UTC- 7)		Unknown	1 had a shade	Yes
908	Gopher, Jeff	3/14/2014 6:46:18 FM(UTC- 7)		Unknown		Yes
909	Gopher, Jeff.	3/14/2014 6:30:51 PM(UTC- 7)		Unknown		Yes:
910	Chachy Y CONFIDENTIAL - ATTOR	3/14/2014 5:45:46 PM(UTC- 7)		Unknown	Lee000000	Yes

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911	leyden@cdwdivision7. com	3/14/2014 3:42:29 PM(UTC- 7)	#.16998	Unknown	**************************************	- T
912	2114	3/14/2014 8:01:44 AM(UTC- 7)		Unknown -		
913	Chritian caper	3/13/2014 7:13:24 PM(UTC- 7)		Unkhown	, y, a communication and a second communication	Yes
914	2114	3/13/2014 7:01:26 PM(UTC- 7)		Unknown		
915	2114	3/13/2014 5:45:28 PM(UTC- 7)		Unknown		
916	2114	3/13/2014 5:44:44 PM(UTC- 7)		Unknown		**************************************
917	6456 Steve day	3/12/2014 3:50:40 PM(UTC- 7)		Unknoym		Yes
918	6456: Steve day	3/12/2014 3:50:18 PM(UTC- 7)		Unknown		Yes
919	6456 Steve day	3/12/2014 3:08:16 PM(UTC- 7)		Unknown		Yes
920:	Steve day	3/12/2014 3:07:45 PM(UTC- 7)		Unknown		Yes
921	Maggie Ding Cel	3/12/2014 12:29:51 PM(UTC- 7)		Unknown	ng a sa s	Yes
922	8418 Nic sandoval	3/12/2014 12:28:43 PM(UTC- 7)		Unknown	1.06 57 9.447 9 98-98-98	Yes
923	0075 Maggie Ding Cel	3/12/2014 12:27:54 PM(UTG- 7)		Unknown	.,,	Yes.
924	Maggie Ding Cel	3/12/2014 10:24:21: AM(UTC- 7)		Unknown		Yes

#### User Accounts (8)

#	User Account	Entries	Addresses	Notes	Deleted
1	Creation time Username: ylee64@hotmail.com		5.00 P. C.		
	Service Type: 457F09B7-8EB2- 4C42-8B8F-2ED8D4CE74D4			THE STATE OF THE S	
2	Creation time Username: sangdangdoodle@yahoo.com			3	
	Service Type: 6C81C570-9138- 4A88-976C-74362029C68C		Le roch comproser vote		
3	Creation time Username: yunlee				
	Service Type: SMTP				
	Server Address; smtp.me.com	**************************************			ļ
4	Creation time Username: yki2005	000 ATT		Total Parish and Control of the Cont	
	Service Type: SMTP				
	Server Address: outgoing, verizon net			and the state of t	
5	Creation time Usemame: sangdangdoodle@yahoo,com		A STATE OF THE STA		
	Service Type: Find My iPhone	3		TO CONTRACT	
6	Creation time Username: ebay			The second secon	
	Account Name; ebay database storage		- sooner maritime		
	Service Type: Griall webcache				

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# **EXHIBIT C**

#### Atkinson-Baker Court Reporters www.depo.com

Ī	UNITED STATES DISTRICT COURT
2	CENTRAL DISTRICT OF CALIFORNIA
3-	WESTERN DIVISION
Ą	÷ ⇒, ÷
(3)	CORY SPENCER, AN INDIVIDUAL; DIANA MILENA REED, AN INDIVIDUAL; AND COASTAL
6	
***** ******	PROTECTION RANGERS, INC., ) A CALIFORNIA NON-PROFIT PUBLIC ) BENEFIT CORPORATION, )
ē	Plaintiffs,
9	$\begin{pmatrix} \chi \dot{s} &
10	LUMADA BAY BOYS: THE INDIVIDUAL
11	MEMBERS OF THE LUNADA BAY BOIS, A
12	SANG LEE, BRANT BLAKEMAN, ALAN JOHNSTON AKA JALIAN JOHNSTON,
13	MICHÀEL RÀE PAPAYANS, ANGELO ) FERRARA, FRANK FERRARA, )
14	CHARLIE FERRARA, ET AL,,
15	Defendants. )
16	
17	Videotaped deposition of
18	SANG LEE
19	COSTA MESA, CALIFORNIA
20	MAY 31, 2017
21	Atkinson-Baker, Inc. Court Reporters
22	°www.d∈po.com (8.00) 288–3376
23	
.24	REPORTED BY: ANGELIQUE MELODY FERRIO, CSR NO. 5979
25	FILE NO: ABUSALU
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#### Atkinson-Baker Court Reporters www.depo.com

1	with your attorney about because that's between you	J9:13:35
3	and your attorney	da:13:41
3	A. Yeah.	39:13:43
4	Q but did you review any documents?	09:13:43
5	A. No.	99:13:45
6	Q. Okay. And when you say that you met with	09:13:46
7	your attorney yesterday, who did you meet with?	09:13:50
.8	A. With Dan, Ed, and Terra, but she's not here.	89:13:52
	Q. And have you ever spoken with any of the	68:14:60
93	other Defendants about this lawsuit?	\$9:14:04
10		09(14:07
1.7	A. No.  Q. And have you ever spoken to anyone who surfs	09:14:09
1 C	in Palos Verdes Estates about the lawsuit?	09:14:17
13		09:14:20
1.4	A. No.	
15	Q. Let me broaden that out a little bit.	09:14:20
16	Have you ever communicated with any of the	09:14:23
17	Defendants about this lawsuit?	09:24:35
1.8	A. What do you mean like communicated. I never	09:14:27
19	talked about the lawsuit, yeah.	09:14:71
20	Q. Did you ever communicate in writing in an	09:14:33
21	E-Mail, in a letter, in a text?	09:14:39
22	A. No.	09:14:42.
23	Q. Okay.	09:14:43
24	A. I mean, people come up and say how you doing.	09:14:46
2:5	And I say, uh-huh, but that's it, but I don't talk	09:14:50

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#### Atkinson-Baker Court Reporters www.depo.com

1	BY MS. POOLEY:	09:20:23
2	Q. That's fine.	9:20:24
3	When did you retain your lawyer?	09:20:26
4	A. I don't even know. It was probably within a	49:20:28
5	month after I got served.	19:20:35
6	Q. So, and is that then, within a month of when	09:20:37
7	you got served, when you came to the understanding	09:20:42
8	that you had an obligation to preserve evidence	08:20:46
9	related to this matter?	-09:35:→3
10	A. What was it?	99:20:8£
11	Q. Was it within a month of when you got served	09:20:52
12	that you first came to an understanding that you	(9:26:55
13	needed to preserve evidence related to this matter?	58:20:58
14	A. I don't know if it was a month. It was just	09430:01
15	after when I met with my lawyers they told me so.	79:31:64
16	Q. Again, I'm not interested in communications	09:21:09
17	between you and your lawyer.	79:21:21
1:8.	A. But I don't know the time exactly, so, that's	7/9:51:13
Ιè	why I'm telling you.	A9:22:15
20	Q. Okay. After you became aware that you had an	69:21:17
21	obligation to preserve evidence related to this case;	49422424
22	did you take any steps to preserve evidence?	49:21:26
23	A. Did I take any steps?	09:21:32
24	Q. Yes. Did you do anything to make sure that	09:21;34
25	any evidence that you had wasn't lost or destroyed?	69:21:39
23 24 25	Q. Yes. Did you do anything to make sure that	09:21;

2.2

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#### Atkinson-Baker Court Reporters www.depo.com

2.	A. I just didn't erase it. It's all there, so.	09:21:44
2	Q. When you say it's all there, where do you	09:21:48
3.	mean?	09;21:82
.4	A. It's in my E-Mail and my phones. I never	09:22:52
5	tried to, you know.	48:21:88
ଟ	Q. Okay. And so do you have the same phone that	09:21:57
· 7	you had when you first got served?	99:22:65
	1900	09124:05
8	A. Yes.  Q. Did you ever do anything to download or image	09:22:06
0,1	the E-Mails that had on your phone related to this	09:32:24
10		₹9:22:27
11	case?  MR. CROWLEY: Objection, that it's vague and	05:22:27
12	ambiguous. You can answer to the extent that you	09:22:28
13	ambiguous. You can answer to the converse	
14.	know.	09:22:31
15	THE WITNESS: Well, no, I don't believe so,	09:02:71
16	no.	09:22:33
17	BY MS. POOLEY:	09422:33
1,8	Q. You did not?	79:22:34
19	A. Download any E-Mails?	(P: 32 : 34
20	Q. Did you do anything to download or image any	09:22:37
.21	E-Mails or other information on your phone that might	09:02:44
22	be related to this case?	09:22:47
23	MR. CROWLEY: Are you asking did he	99:22:48
.24	personally because that's the issue that I think is	09:23:50
25	vague and ambiguous about the question.	09:22:52
31		

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